

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF *ePLUS* INC'S OBJECTIONS TO DEFENDANT'S COUNTER  
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS  
AND REVISED SUMMARY OF THE DEPOSITION OF  
HENRIK BILLGREN (OCT. 21, 2009)**

Plaintiff, *ePlus*, Inc. ("*ePlus*"), through counsel, hereby submits the following specific objections to Defendant Lawson Software, Inc. ("*Lawson*")'s Counter-Deposition Designations of the deposition of Henrik Billgren (October 21, 2009) and offers the following counter-counter designations and revised summary:

**Specific Objections**

Defendant's Counter Designations	<i>ePlus</i> 's Objections to Defendant's Counter Designations	<i>ePlus</i> 's Counter-Counter Designations
34:8-22; 35:7-19; 37:3-6	402 (34:8-22; 35:7-19); 106 (incomplete designation at 37:3-6)	
49:6-13; 49:15-20	402	47:12-48:9
59:18 – 60:18	402; 403	
62:11-16; 62:20 – 63:1; 63:12-20		64:2-3; 64:11.
66:18-19		
72:8 – 73:2; 73:13-18		73:3-10; 73:12

<b>Defendant's Counter Designations</b>	<b><i>ePlus's</i> Objections to Defendant's Counter Designations</b>	<b><i>ePlus's</i> Counter-Counter Designations</b>
74:5-13		
108:12 – 109:4	403	
150:9-14		
189:7-13		183:10-184:3; 188:21-189:6
198:14-20		198:9-14
201:7-10; 201:18-20; 202:3-5; 203:2-4	403; 602 (201:7-10)	201:11-17; 201:21-202:2
208:3-9	602	
218:17-21	602	
220:4-7		
221:8-16	602	220:13-221-7
232:10-19		
235:11-19	403	

### **Revised Summary**

Designated testimony relates to:

Mr. Billgren is the Vice President of M3 Industries and Application Product Management. 30:16-20. His responsibilities include leading a team that formulates industry and application strategy for the M3 software. 30:21-31:4. Mr. Billgren started work with Intenia in February of 1984, though is official registration date with Intenia is June 1, 1985. He was the co-founder of Intenia. (34:8-22) Mr. Billgren was responsible for the sales and implementation of the MPM systems at Intenia. (35:7-19) When Intenia was acquired by Lawson Mr. Billgren held the position of President of Intenia R&D. (37:3-6)

The M3 product line is comprised of different suites, including Supply Chain Management, Manufacturing, Maintenance, Financials, and CRM. Each suite is comprised of different applications. 42:20-43:5. The M3 Business Engine, or M3 Back Office, is Lawson's European solution for manufacturing and distribution that covers business applications from procurement to manufacturing into sales, only aimed for manufacturing and distribution companies. 29:19-30:3; 79:19-80:9.

e-Procurement is a "bolted-on" application for the M3 Business Engine. 50:6-7. Procurement is something that most of Lawson customer have because it is the replenished procurement process. e-Procurement is used by a few of customers and is for providing a requisition process for handling indirect material. (59:18 – 60:18) Mr. Billgren was only aware of one customer in the United States for the M3 e-Procurement module. (62:11; 62:20-63:1; 63:12-20)<sup>1</sup> e-Procurement is currently being marketed within the United States by Lawson. 63:21-64:1. Lawson is prepared to provide webinar presentations to potential customers on its e-Procurement application. 203:5-16. No webinars have been prepared regarding the M3 e-Procurement application. (203:2-4) The e-Procurement product existed before the merger between Intenia and Lawson. It was called e-Procurement. (74:5-13) The current version of e-Procurement is 7.1, which has been generally available since May 2007. 74:14-18; 75:3-6. e-Procurement is comprised of several modules, including Buy Center, Supply Center, e-Procurement Business Center, e-Procurement Design Center Tools, and XML Application Adapter EPR. 103:7-104:7.

M3 e-Procurement includes the functionality to build requisitions and supplier orders for desired indirect items. 49:21-51:22. The procurement application in the M3 suite includes an auto-replenishment type of process. (49:6-13; 49:15-20) The Business Center is where the authorization process for requisitions occurs. 84:19-21. The supplier orders are generated automatically once the requisitions have been approved. 51:19-22. The e-Procurement application can be integrated with the M3 system so that shadow supplier orders and purchase order confirmations are received in both the M3 Back Office and the e-Procurement application. 134:6-135:20.

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<sup>1</sup> Lawson suggests that the following statement be added: "The M3 e-Procurement module has only one customer in the United States." ePlus objects to this mischaracterization of the testimony and qualifies this statement to reflect that the witness testified that he himself was only aware of one customer in the United States.

M3 e-Procurement supports the procurement of indirect material (i.e., non-stock items). 50:6-12. M3 e-Procurement results in fewer steps and less difficulty than might be encountered with a manual procurement system. 82:9-83:3. Within e-Procurement is Supplier Self-Service, or Supplier Center, which allows Lawson's customers to share information with their suppliers. 52:19-53:17. Using Supplier Self-Service, suppliers can upload Excel spreadsheets or XML documents containing items for purchase by customers, or supplier catalogs. 53:18-22; 54:7-15; 69:7-70:17; 85:12-86:20; 92:4-18; 142:5-21. XML documents are uploaded using the XML Gateway. 154:17-155:7. Multiple supplier catalogs can be maintained in the meta-catalog database in the Buy Center. 85:1-86:20. Data fields for items included in the files that suppliers upload onto Supplier Self-Service include item number, item description, price, and any other text to be displayed with the item. 143:20-144:8. Supplier Self-Service also allows external marketplaces comprised of several suppliers to upload items for purchase by customers. 70:18-71:13. Suppliers can also respond to supplier orders from customers, such as confirming the delivery date and updating the supplier order. 54:16-20; 55:7-15; 152:9-153:13.

In order to obtain a license to the e-Procurement application a customer does not need to license the Business Engine. e-Procurement and the Business Engine are not connected and have separate licenses. (72:8-73:2; 73:13-18) However, you have to have the Websphere run time environment in place to make the M3 e-Procurement application function. (73:3-10; 73:12)

A customer logs onto the Buy Center within e-Procurement to create and authorize requisitions for desired items from the list of items uploaded to the Supplier Center by the suppliers.<sup>2</sup> 68:4-69:1;70:5-17. Particular roles can be defined for users of the e-Procurement application such that a user can be provided access to a limited number of supplier product catalogs. 151:1-6. Supplier orders can be either posted in the Supply Center for suppliers or sent to suppliers via email. 152:9-153:13. Suppliers can provide purchase order confirmation communications to the buyer including partial confirmation of an order. 135:9-20; 157:5-8; 157:14-158:11; 159:4-19; 222:19-223:10. In order to deploy the e-Procurement application, customers need to have catalogs that are associated with suppliers. 140:22-141:11. Suppliers are responsible for maintaining the catalogs that can be viewed by customers in the Buy Center. 85:1-86:2. The Catalog Publish procedure takes the information from the Product Supply table and copies it to the Product Buy table. 147:20-148:6. The Product Buy table is the approved catalog seen by customers when building a requisition in e-Procurement. 148:6-8.

The e-Procurement application includes the functionality to search a database for items to locate items to include on the requisition. 52:11-15; 52:17. Users can also search for items to requisition by navigating through a hierarchy of product groups, the bottom level of the hierarchy presenting a list of products. 93:11-94:16. Mr. Billgren's understanding is that the e-Procurement application does not have wild card searches.<sup>3</sup> (221:8-16) Customers can view the

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<sup>2</sup> Lawson contends that the formerly used phrase "from catalogs of all its suppliers" is not accurate. ePlus has replaced this phrase with "from the list of items loaded onto the Supplier Center by the suppliers" to more precisely reflect the witness's testimony.

<sup>3</sup> Lawson contends that the witness testified that, to his understanding, the e-Procurement application does not allow the user to view the supplier in the search user interface. ePlus objects

supplier name when searching for items to build a requisition in the e-Procurement application. 221:17-222:4. Items selected from search results are added to the shopping cart. 212:8-16.

A product group is the sorting identity to which all products are connected so that buyer can view the products by product group. 149:3-9. The product groups are presented in hierarchical fashion, so that the product group search functionality can be used to drill down through the hierarchy from general product groups to more specific product groups when a search is being performed for a particular item. 149:10-150:8. The e-Procurement application does not come with a predefined product group hierarchy tree and a user must define the product group hierarchy when setting up the system.<sup>4</sup> (150:9-14) Within the e-Procurement application, UNSPSC ranges can be associated with product groups. 219:10-220:3; 220:8-12. Mr. Billgren did not understand the context of what was discussed. (220:4-7)

The standard percentage of the license fee for maintenance and support of the M3 applications is 21 percent. 110:15-21. Included in this cost are enhancements or new versions of the applications, error correction, and compliance with regulatory or statutory requirements. 231:7-232:1. It is Lawson's commitment to correct errors not to debug. A customer has to give the error and then Lawson will correct it. (232:10-19) Support through a help desk is also provided. 232:2-5. Lawson provides training and education, as well as documentation such as online help text and webinars, to its customers as part of the ongoing maintenance and support services. 232:20-233:7; 233:16-234:14. Lawson also provides product manuals for the M3 e-Procurement application. 139:10-140:5.

Lawson provides consulting for the e-Procurement application, including education, project management, and web design. 110:22-111:9. Project management involves the supervision of all tasks that need to be done to make an implementation successful.<sup>5</sup> 111:10-14. Upon request, Lawson assists customers with installation, configuration, and implementation of the e-Procurement application, including data migration. 111:15-18; 235:3-10; 235:20-236:10. Lawson typically likes to be engaged and involved in the installation of the e-Procurement application. 117:5-18.

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as the witness was asked this question, but answered only that the e-Procurement application, to his understanding, does not have wild card searches.

<sup>4</sup> Lawson suggests that the following statement be added: "The e-Procurement application does not come with a hierarchy tree and a user does not have to define the product group hierarchy when setting up the system." ePlus has revised the statement to more accurately reflect the witness's testimony.

<sup>5</sup> Lawson suggests that the following statement be added: "Lawson does not assist customer's with setting up a catalog the customer works with the Supply Center." ePlus objects as this statement mischaracterizes the witness's testimony. The witness stated that catalogs are not set up by the customers in the Buy Center. The supplier edits and updates its product lists and catalogs in the Supply Center. Lawson does not assist the suppliers in setting up catalogs in the Supply Center. Accordingly, this testimony has no relevance to the services Lawson provides to its customers.

There are no plans to add the Punchout functionality to the M3 e-Procurement application. (189:7-13)<sup>6</sup>

Lawson relies on multiple industry analysts, including ARC Advisory, Aberdeen Group, AMR, and Gartner. 191:8-18. Mr. Billgren and other members of his product management team receive copies of these analyst reports. 191:19-192:4. Mr. Billgren receives reports related to the M3 side of the Lawson business. 193:4-12.

Lawson competes for sales with SAP and Ariba for the M3 e-Procurement application. 108:6-11. Lawson does not compete with Tier 2 or local players regarding the sale of its e-Procurement application. To Mr. Billgren's knowledge, Lawson has not engaged in any competitive analysis regarding the U.S. market for sales of the e-Procurement application.<sup>7</sup> (108:12 – 109:4) Lawson's products are high-priced compared to its competitors offering similar products, such as SAP and Oracle. 196:21-198:4; 198:6-8. e-Procurement is not one of Lawson's "focused solutions" therefore it is not priced to be competitive. (198:14-20) To Mr. Billgren's knowledge, Lawson has never competed against ePlus for an e-Procurement application sale.<sup>8</sup> Lawson has no solution consultants in the Americas trained on e-Procurement and no lead generation program was implemented in the United States. (201:7-10; 201:18-20; 202:3-5)

Mr. Billgren does not know who actually assisted TINE, one of Lawson's customers, in implementing OCI functionality.<sup>9</sup> It is the customer's responsibility to implement OCI functionality. (208:3-9)

Mr. Billgren is not familiar with Exhibit 17 or who created the document. (218:17-21)

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<sup>6</sup> Lawson suggests that the following statement be added: "There are no plans to add the Punchout functionality to the e-Procurement application or the M3 e-Procurement application." This statement does not accurately reflect the testimony. The witness responded only as to "M3 e-Procurement."

<sup>7</sup> ePlus objects to this mischaracterization of the testimony and qualifies this statement added by Lawson to reflect that the witness testified that he himself was not aware of any competitive analysis engaged in by Lawson as it relates to sales of the e-Procurement application.

<sup>8</sup> ePlus objects to this mischaracterization of the testimony and qualifies this statement added by Lawson to reflect that the witness testified that he himself was not aware of any competition with ePlus for sales of the e-Procurement application.

<sup>9</sup> Lawson added the statement that it is the customer's responsibility to implement OCI functionality. ePlus objects to the incomplete summary of the witness's testimony and adds a prefatory statement to reflect the witness's testimony that he did not know who had implemented the OCI functionality for the customer in question.

Respectfully submitted,

/s/

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Craig T. Merritt (VSB #20281)  
Henry I. Willett, III (VSB #44655)  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Telephone: (804) 697-4100  
cmerritt@cblaw.com  
hwillett@cblaw.com

Scott L. Robertson (admitted *pro hac vice*)  
Jennifer A. Albert (admitted *pro hac vice*)  
David M. Young (VSB#35997)  
**GOODWIN PROCTER LLP**  
901 New York Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 346-4000  
SRobertson@goodwinprocter.com  
JAlbert@goodwinprocter.com  
DYoung@goodwinprocter.com

Michael G. Strapp (admitted *pro hac vice*)  
James D. Clements (admitted *pro hac vice*)  
**GOODWIN PROCTER LLP**  
Exchange Place  
53 State Street  
Boston, MA 02109-2881  
Telephone: (617) 570-1000  
MSrapp@goodwinprocter.com  
JClements@Goodwinprocter.com

*Attorneys for Plaintiff, ePlus Inc.*

Dated: August 11, 2010

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<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE EASTERN DISTRICT OF VIRGINIA</p> <p>3 Richmond Division</p> <p>4 -----x</p> <p>5 ePLUS INC., )</p> <p>6 Plaintiff, ) Civil Action No.</p> <p>7 v. ) 3:09-CV-620 (JRS)</p> <p>8 LAWSON SOFTWARE, INC., )</p> <p>9 Defendant. )</p> <p>10 -----x</p> <p>11 CONFIDENTIAL</p> <p>12 30(b)(6) Videotaped Deposition of</p> <p>13 Lawson Software, Inc.</p> <p>14 by and through its corporate designee</p> <p>15 HENRIK BILLGREN</p> <p>16 and in his personal capacity</p> <p>17 Washington, D.C.</p> <p>18 Wednesday, October 21, 2009</p> <p>19 11:06 a.m.</p> <p>20 Job No.: 1-165763</p> <p>21 Pages: 1 - 250, Volume 1</p> <p>22 Reported By: Lee Bursten</p>	<p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFF:</p> <p>3 JENNIFER A. ALBERT, ESQUIRE</p> <p>4 Goodwin Procter LLP</p> <p>5 901 New York Avenue, Northwest</p> <p>6 Washington, D.C. 20001</p> <p>7 Telephone: (202) 346-4000</p> <p>8</p> <p>9</p> <p>10</p> <p>11 ON BEHALF OF DEFENDANT:</p> <p>12 WILLIAM D. SCHULTZ, ESQUIRE</p> <p>13 Merchant &amp; Gould PC</p> <p>14 3200 IDS Center</p> <p>15 80 South Eighth Street</p> <p>16 Minneapolis, Minnesota 55402</p> <p>17 Telephone: (612) 332-5300</p> <p>18</p> <p>19</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 ANTONIO TROPEANO, Videographer</p>
<p>1 30(b)(6) Videotaped Deposition of Lawson</p> <p>2 Software, Inc. by and through its corporate</p> <p>3 designee HENRIK BILLGREN and in his personal</p> <p>4 capacity, held at the offices of:</p> <p>5 Goodwin Procter LLP</p> <p>6 901 New York Avenue, Northwest</p> <p>7 Washington, D.C. 20001</p> <p>8 (202) 346-4000</p> <p>9</p> <p>10</p> <p>11</p> <p>12 Pursuant to notice, before Lee Bursten,</p> <p>13 Court Reporter and Notary Public in and for the</p> <p>14 District of Columbia, who officiated in</p> <p>15 administering the oath to the witness.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	<p>1 C O N T E N T S</p> <p>2 EXAMINATION OF HENRIK BILLGREN PAGE</p> <p>3 By Ms. Albert 9</p> <p>4</p> <p>5</p> <p>6 E X H I B I T S</p> <p>7 (Attached to transcript.)</p> <p>8 BILLGREN DEPOSITION EXHIBITS PAGE</p> <p>9 Exhibit 1 Plaintiff ePlus Inc.'s 11</p> <p>10 Amended Notice of</p> <p>11 Deposition of Henrik</p> <p>12 Billgren</p> <p>13 Exhibit 2 Plaintiff ePlus Inc.'s 12</p> <p>14 First Notice of</p> <p>15 Deposition of Defendant</p> <p>16 Lawson Software, Inc.,</p> <p>17 Pursuant to Rule</p> <p>18 30(b)(6)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>



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<p>5</p> <p>1 EXHIBITS CONTINUED</p> <p>2 BILLGREN DEPOSITION EXHIBITS PAGE</p> <p>3 Exhibit 3 Plaintiff ePlus inc.'s 16</p> <p>4 Second Notice of</p> <p>5 Deposition of Defendant</p> <p>6 Lawson Software, Inc.</p> <p>7 Pursuant to Rule</p> <p>8 30(b)(6)</p> <p>9 Exhibit 4 Introduction to the 55</p> <p>10 Lawson M3 Product Line</p> <p>11 Exhibit 5 Lawson M3 e-Procurement 76</p> <p>12 Exhibit 6 Lawson M3 Enterprise 100</p> <p>13 Management System</p> <p>14 Application Overview</p> <p>15 Exhibit 7 Battle Card: Lawson M3 106</p> <p>16 e-Procurement, September</p> <p>17 2007</p> <p>18 Exhibit 8 Lawson M3 e-Procurement 115</p> <p>19 13.1.1.3.0, Quick</p> <p>20 Installation Guide</p> <p>21</p> <p>22</p>	<p>7</p> <p>1 EXHIBITS CONTINUED</p> <p>2 BILLGREN DEPOSITION EXHIBITS PAGE</p> <p>3 Exhibit 19 OAGIS 9_2 GetCatalog 227</p> <p>4 Documentation</p> <p>5 Exhibit 20 The Directory Listing 241</p> <p>6 the Proposal Automation</p> <p>7 Suite</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>6</p> <p>1 EXHIBITS CONTINUED</p> <p>2 BILLGREN DEPOSITION EXHIBITS PAGE</p> <p>3 Exhibit 9 Lawson M3 e-Procurement 126</p> <p>4 13.1.1.3.0 Installation</p> <p>5 and Setup Guide</p> <p>6 Exhibit 10 Lawson M3 e-Procurement 128</p> <p>7 13.1.1.3.0, M3</p> <p>8 Integrators' Guide</p> <p>9 Exhibit 11 Lawson M3 e-Procurement 139</p> <p>10 13.1.1.3.0 Deployment</p> <p>11 Guide</p> <p>12 Exhibit 13 Design Center 5.5 166</p> <p>13 Component Reference</p> <p>14 Exhibit 14 Input to Supplier Portal 168</p> <p>15 Exhibit 15 M3 e-Procurement 7.X for 183</p> <p>16 U.S.</p> <p>17 Exhibit 16 M3 e-Procurement 205</p> <p>18 Exhibit 17 EPR 6 Requirements 218</p> <p>19 Exhibit 18 Untitled document, 223</p> <p>20 production numbers LE</p> <p>21 00220257 through 275</p> <p>22</p>	<p>8</p> <p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Here begins videotape</p> <p>3 number 1 in the deposition of Henrik Billgren in</p> <p>4 the matter of ePlus inc. versus Lawson Software,</p> <p>5 Inc., in the United States District Court for the</p> <p>6 Eastern District of Virginia, Richmond Division,</p> <p>7 case number 3:09-CV-207 JRS.</p> <p>8 Today's date is October 21st, 2009. The</p> <p>9 time on the video monitor is 11:06 a.m. The video</p> <p>10 operator today is Antonio Tropeano of Merrill LAD.</p> <p>11 This video deposition is taking place at Goodwin</p> <p>12 Procter, 901 New York Avenue, Northwest,</p> <p>13 Washington, D.C., 20001. Counsel, please voice</p> <p>14 identify yourselves and state whom you represent.</p> <p>15 MS. ALBERT: Jennifer Albert with the law</p> <p>16 firm of Goodwin Procter, representing the</p> <p>17 plaintiff, ePlus incorporated.</p> <p>18 MR. SCHULTZ: William Schultz with the</p> <p>19 law firm of Merchant &amp; Gould, representing Lawson</p> <p>20 Software, Incorporated.</p> <p>21 THE VIDEOGRAPHER: The court reporter</p> <p>22 today is Lee Bursten of Merrill LAD. Would the</p>

<p>9</p> <p>1 reporter please swear in the witness.</p> <p>2 HENRIK BILLGREN</p> <p>3 having been duly sworn, testified as follows:</p> <p>4 EXAMINATION BY COUNSEL FOR PLAINTIFF</p> <p>5 BY MS. ALBERT:</p> <p>6 Q Good morning, Mr. Billgren. My name is</p> <p>7 Jennifer Albert, and I represent the plaintiff</p> <p>8 ePlus incorporated in this matter. Can you please</p> <p>9 provide your full name, residence address, and</p> <p>10 business address for the record.</p> <p>11 A Henrik Billgren. I live in Sweden,</p> <p>12 Mosstorsvägen 32, T7by. And I work at Vendervägen</p> <p>13 89 in Danderyd, Sweden.</p> <p>14 Q Mr. Billgren, do you understand that your</p> <p>15 answers today are being given under oath, and that</p> <p>16 you're under the same obligation as if you were in</p> <p>17 court to answer truthfully and completely?</p> <p>18 A Yes. I do.</p> <p>19 Q If one of my questions today is unclear,</p> <p>20 please let me know and I'll try to clarify it.</p> <p>21 Will you do that?</p> <p>22 A I will.</p>	<p>11</p> <p>1 Q Have you ever been deposed before?</p> <p>2 A No.</p> <p>3 Q Have you ever testified at a trial?</p> <p>4 A Yes.</p> <p>5 Q What was the nature of that proceeding?</p> <p>6 A It was a traffic thing in Sweden.</p> <p>7 Q Have you ever testified in any other type</p> <p>8 of proceeding?</p> <p>9 A No.</p> <p>10 Q Have you ever been provided testimony in</p> <p>11 the form of an affidavit or a declaration?</p> <p>12 A No.</p> <p>13 (Billgren Exhibit 1 was marked for</p> <p>14 identification and attached to the deposition</p> <p>15 transcript.)</p> <p>16 BY MS. ALBERT:</p> <p>17 Q The court reporter has marked as Billgren</p> <p>18 Exhibit 1 a copy of Plaintiff ePlus inc.'s Amended</p> <p>19 Notice of Deposition of Henrik Billgren. Let me</p> <p>20 hand that to you. Mr. Billgren, are you appearing</p> <p>21 here today pursuant to this notice of deposition?</p> <p>22 A Yes, I am.</p>
<p>10</p> <p>1 Q If you need to take a break at any time,</p> <p>2 please let me know and I'll try to accommodate you.</p> <p>3 Are you taking any medication or drugs that would</p> <p>4 affect your ability to answer my questions</p> <p>5 truthfully and accurately?</p> <p>6 A No.</p> <p>7 Q Is there any reason that you feel that</p> <p>8 you would not be able to give truthful and accurate</p> <p>9 answers to my questions today?</p> <p>10 A No.</p> <p>11 Q Your counsel may object to my questions</p> <p>12 from time to time. But unless your counsel</p> <p>13 specifically instructs you not to answer one of my</p> <p>14 questions, I expect you to answer my question. Do</p> <p>15 you understand?</p> <p>16 A Yes.</p> <p>17 Q The court reporter needs to take down</p> <p>18 everything that we say today. He can't take down</p> <p>19 non-verbal responses or shakes of your head. So</p> <p>20 you need to verbally respond to each of my</p> <p>21 questions. Do you understand?</p> <p>22 A Yes.</p>	<p>12</p> <p>1 MS. ALBERT: Let me ask the reporter to</p> <p>2 mark as Billgren Exhibit 2 a copy of Plaintiff</p> <p>3 ePlus inc.'s First Notice of Deposition of</p> <p>4 Defendant Lawson Software, Inc., Pursuant to Rule</p> <p>5 30(b)(6) of the Federal Rules of Civil Procedure.</p> <p>6 (Billgren Exhibit 2 was marked for</p> <p>7 identification and attached to the deposition</p> <p>8 transcript.)</p> <p>9 BY MS. ALBERT:</p> <p>10 Q Mr. Billgren, have you ever seen this</p> <p>11 corporate notice of deposition before?</p> <p>12 A Yes.</p> <p>13 Q And do you understand that Lawson</p> <p>14 Software has designated you to testify on its</p> <p>15 behalf with respect to some of the topics set forth</p> <p>16 in this deposition notice marked as Exhibit 2?</p> <p>17 A Yes.</p> <p>18 Q When were you first made aware that you</p> <p>19 were being designated to testify on Lawson</p> <p>20 Software's behalf?</p> <p>21 A When? In an e-mail a couple of weeks</p> <p>22 ago.</p>

<p>1 Q Could you turn to page 10 of the</p> <p>2 deposition notice.</p> <p>3 A Mm-hmm.</p> <p>4 Q And do you see starting on that page</p> <p>5 there's a heading, "Topic Areas for Rule 30(b)(6)</p> <p>6 Deposition of Lawson"? Do you see that heading?</p> <p>7 A The heading on page 10, I see the</p> <p>8 heading, yes.</p> <p>9 Q Do you understand -- and you see listed</p> <p>10 there beginning at page 10 through the end of the</p> <p>11 document a number of topics areas for which ePlus</p> <p>12 has requested that Lawson provide a witness to</p> <p>13 testify on its behalf?</p> <p>14 A Yes.</p> <p>15 Q Do you understand that Lawson has</p> <p>16 designated you to testify on its behalf with</p> <p>17 respect to topic number 1 of this notice, which</p> <p>18 requests testimony concerning the cost savings,</p> <p>19 expenditure reductions, price reductions, or other</p> <p>20 economic benefits realized by Lawson customers</p> <p>21 either directly or indirectly related to their use,</p> <p>22 implementation, and/or availability of the Lawson</p>	<p>15</p> <p>1 content, and participants in the market for</p> <p>2 electronic sourcing and procurement systems and/or</p> <p>3 services including Lawson's share of that market</p> <p>4 and the availability of noninfringing alternatives</p> <p>5 to the patents in suit. Do you see that topic?</p> <p>6 A Yes.</p> <p>7 Q Do you understand that Lawson has</p> <p>8 designated you to testify on its behalf concerning</p> <p>9 topic number 6?</p> <p>10 A Yes.</p> <p>11 Q Are you prepared to testify as to all</p> <p>12 matters known or reasonably available to Lawson</p> <p>13 concerning topic number 6?</p> <p>14 A I think I need to clarify what you mean</p> <p>15 by everything related to Lawson here, because I</p> <p>16 have -- I'm prepared to testify to topic number 6</p> <p>17 when it comes to what we call M3.</p> <p>18 Q Okay.</p> <p>19 A And I'm not prepared to testify to the</p> <p>20 solution that we call S3, if that makes any sense.</p> <p>21 Q That does make --</p> <p>22 A But I have read it, and I am prepared to</p>
<p>14</p> <p>1 electronic sourcing and procurement systems and/or</p> <p>2 services?</p> <p>3 A What was the question, the beginning</p> <p>4 of --</p> <p>5 Q I know that was a mouthful. Do you</p> <p>6 understand that Lawson has designated you to</p> <p>7 testify on its behalf with respect to topic number</p> <p>8 1?</p> <p>9 A Yes.</p> <p>10 Q Do you see topic number 3 on that page?</p> <p>11 A Yes.</p> <p>12 Q Do you understand that Lawson has</p> <p>13 designated you to testify on its behalf regarding</p> <p>14 topic number 3?</p> <p>15 A Yes.</p> <p>16 Q And are you prepared to testify as to all</p> <p>17 matters known or reasonably available to Lawson</p> <p>18 concerning topic number 3?</p> <p>19 A Yes.</p> <p>20 Q Could you turn to the next page, and</p> <p>21 reference topic number 6 on that page. That topic</p> <p>22 requests Lawson's testimony concerning the scope,</p>	<p>16</p> <p>1 testify on behalf of Lawson. But my understanding</p> <p>2 is that it relates to what we call our M3 solution,</p> <p>3 not S3.</p> <p>4 Q All right. Fair enough. And you are</p> <p>5 prepared to testify on topic number 6 as it relates</p> <p>6 to the M3 solution, correct?</p> <p>7 A Yes.</p> <p>8 Q And do you also understand that Lawson</p> <p>9 has designated you to testify on its behalf</p> <p>10 concerning topic number 7?</p> <p>11 A Yes, again, on M3 solution.</p> <p>12 Q And are you prepared to testify as to all</p> <p>13 matters known or reasonably available to Lawson</p> <p>14 concerning topic number 7 as it relates to the M3</p> <p>15 solution?</p> <p>16 A Yes.</p> <p>17 MS. ALBERT: Let me have the reporter</p> <p>18 mark as Billgren Exhibit 3 a copy of Plaintiff</p> <p>19 ePlus inc.'s Second Notice of Deposition of</p> <p>20 Defendant Lawson Software, Inc. Pursuant to Rule</p> <p>21 30(b)(6) of the Federal Rules of Civil Procedure.</p> <p>22 (Billgren Exhibit 3 was marked for</p>

<p>17</p> <p>1 identification and attached to the deposition</p> <p>2 transcript.)</p> <p>3 BY MS. ALBERT:</p> <p>4 Q Have you ever seen a copy of the</p> <p>5 deposition notice that's been marked as Exhibit 3?</p> <p>6 A I'm just determining that. Yes, I have.</p> <p>7 Q And can you turn to pages 9 through the</p> <p>8 end of the notice.</p> <p>9 A Yes.</p> <p>10 Q And that's the section of the notice that</p> <p>11 describes the topic areas for which ePlus has</p> <p>12 requested that Lawson provide a witness to testify</p> <p>13 on its behalf. Do you understand that?</p> <p>14 A Again, related to M3, yes.</p> <p>15 Q Do you understand that Lawson has</p> <p>16 designated you to testify on its behalf with</p> <p>17 respect to topics 1 through 8 in the notice marked</p> <p>18 as Exhibit 3?</p> <p>19 A Yes. Again, with respect to -- reference</p> <p>20 to M3.</p> <p>21 Q And are you prepared to testify as to all</p> <p>22 matters known or reasonably available to Lawson</p>	<p>19</p> <p>1 A Again, M3.</p> <p>2 Q That would be, your testimony is going to</p> <p>3 be related to the M3 solution as it relates to</p> <p>4 topic 20?</p> <p>5 A Yes.</p> <p>6 Q And finally, do you understand that</p> <p>7 Lawson has designated you to testify on its behalf</p> <p>8 with respect to topics 22 through 24 as they relate</p> <p>9 to the M3 product solution?</p> <p>10 A Yes.</p> <p>11 Q Are you prepared to testify on those</p> <p>12 topics today?</p> <p>13 A Yes.</p> <p>14 Q Mr. Billgren, what did you do in order to</p> <p>15 prepare yourself to testify today?</p> <p>16 A I read our manuals, various documents,</p> <p>17 together with my legal counsels. Talked to my</p> <p>18 staff on our -- what M3 capabilities are, secured</p> <p>19 my own personal knowledge to be able to answer</p> <p>20 these questions to the best of my knowledge.</p> <p>21 Q What manuals did you review?</p> <p>22 A Our online -- in preparation for the</p>
<p>18</p> <p>1 regarding each of topics 1 through 8 as it relates</p> <p>2 to the M3 solution?</p> <p>3 A Yes, I am.</p> <p>4 Q Can you turn to pages 11 through 12 in</p> <p>5 the notice. I apologize. Turn to page 13 in the</p> <p>6 notice. Do you understand that Lawson has</p> <p>7 designated you to testify on its behalf with regard</p> <p>8 to topics 17 and 18 as they relate to the M3</p> <p>9 solution?</p> <p>10 A Yes.</p> <p>11 Q And are you prepared to testify today as</p> <p>12 to all matters known or reasonably available to</p> <p>13 Lawson concerning topics 17 and 18 as they relate</p> <p>14 to the M3 solution?</p> <p>15 A Yes.</p> <p>16 Q Do you understand that Lawson has</p> <p>17 designated you to testify on its behalf with</p> <p>18 respect to topic number 20 in the notice?</p> <p>19 A Yes.</p> <p>20 Q Are you prepared to testify today with</p> <p>21 respect to all matters known or reasonably</p> <p>22 available to Lawson concerning topic number 20?</p>	<p>20</p> <p>1 demo, I should say, I read what we call our online</p> <p>2 documentation.</p> <p>3 Q What specific online documentation did</p> <p>4 you read to prepare yourself for the demo?</p> <p>5 A Help text.</p> <p>6 Q Do you recall the title of any of the</p> <p>7 help texts that you reviewed?</p> <p>8 A I do.</p> <p>9 Q What were they?</p> <p>10 A Origin code for purchase proposal.</p> <p>11 Q Did you review any other help texts?</p> <p>12 A No.</p> <p>13 Q Did you review any other type of online</p> <p>14 documentation in addition to the help texts to</p> <p>15 prepare for the deposition today?</p> <p>16 A Yes.</p> <p>17 Q What other types of online documentation</p> <p>18 did you review to prepare for the deposition?</p> <p>19 A Overview presentations in PowerPoint</p> <p>20 format.</p> <p>21 Q Do you recall the title of any of the</p> <p>22 overview presentations that you reviewed?</p>

<p>21</p> <p>1 <b>A No.</b></p> <p>2 Q Do you recall the subject matter of the</p> <p>3 overview presentations that you reviewed?</p> <p>4 <b>A Yes.</b></p> <p>5 Q What was the subject matter of those?</p> <p>6 <b>A E-Procurement.</b></p> <p>7 Q Do you know if those overview</p> <p>8 presentations have been produced to counsel for</p> <p>9 ePlus in this litigation?</p> <p>10 <b>A I -- no.</b></p> <p>11 Q You don't know?</p> <p>12 MS. ALBERT: Counsel, we would request</p> <p>13 production of the overview presentations relating</p> <p>14 to e-Procurement that Mr. Billgren reviewed.</p> <p>15 MR. SCHULTZ: I will check into that. I</p> <p>16 think that a lot of this stuff has been produced,</p> <p>17 though.</p> <p>18 MS. ALBERT: We also would request that</p> <p>19 you provide us with a copy of the help texts that</p> <p>20 are available online relating to the accused</p> <p>21 products in this case.</p> <p>22 BY MS. ALBERT:</p>	<p>23</p> <p>1 discussions?</p> <p>2 <b>A With two individuals.</b></p> <p>3 Q And who were those two individuals?</p> <p>4 <b>A Ole Rasmussen and John Gledhill.</b></p> <p>5 <b>Gledhill.</b></p> <p>6 Q Can you spell his name, please?</p> <p>7 <b>A John, G -- then Gledhill is</b></p> <p>8 <b>G-L-E-D-H-I-L-L.</b></p> <p>9 Q What is Mr. Rasmussen's position?</p> <p>10 <b>A He is global director.</b></p> <p>11 Q Is he global director with respect to any</p> <p>12 particular product?</p> <p>13 <b>A No. Not today.</b></p> <p>14 Q Is he a global director with respect to</p> <p>15 any particular application?</p> <p>16 <b>A No. Not today.</b></p> <p>17 Q What are his responsibilities as global</p> <p>18 director?</p> <p>19 <b>A He is responsible for what I call our</b></p> <p>20 <b>technology and product partners in my organization.</b></p> <p>21 Q And what particular technology does he</p> <p>22 have responsibilities for?</p>
<p>22</p> <p>1 Q Did you review any other type of online</p> <p>2 documentation in addition to the help texts and the</p> <p>3 overview presentations?</p> <p>4 <b>A No.</b></p> <p>5 Q You said you had reviewed various</p> <p>6 documents in addition to this online documentation.</p> <p>7 Do you recall which documents you reviewed?</p> <p>8 <b>A The one you just presented to me, for</b></p> <p>9 <b>instance.</b></p> <p>10 Q Were there any other documents that you</p> <p>11 reviewed in addition to the deposition notices?</p> <p>12 <b>A Mail, normal mail from -- I think either</b></p> <p>13 <b>from you or the plaintiff about what to prepare</b></p> <p>14 <b>from a demonstration perspective.</b></p> <p>15 Q Did you review any other documents in</p> <p>16 addition to the depositions notice and my letter</p> <p>17 concerning preparation of the demonstration system?</p> <p>18 <b>A No.</b></p> <p>19 Q You said you had talked to your staff in</p> <p>20 order to prepare for the deposition today, correct?</p> <p>21 <b>A Yes.</b></p> <p>22 Q With which staff members did you have</p>	<p>24</p> <p>1 <b>A It's an holistic role, so he doesn't have</b></p> <p>2 <b>a particular product management responsibility. He</b></p> <p>3 <b>has an holistic responsibility. But I addressed</b></p> <p>4 <b>him in the capacity of a former position he held.</b></p> <p>5 Q What was the former position that he held</p> <p>6 that had relevance to your deposition today?</p> <p>7 <b>A He was responsible for e-Procurement.</b></p> <p>8 Q When was he responsible for the</p> <p>9 e-Procurement application?</p> <p>10 <b>A I don't recall exact dates.</b></p> <p>11 Q Do you recall general time frame?</p> <p>12 <b>A I don't want to speculate.</b></p> <p>13 Q When did he change his position to become</p> <p>14 global director?</p> <p>15 <b>A To become -- he did that -- I don't</b></p> <p>16 <b>recall exact dates.</b></p> <p>17 Q Was he responsible for e-Procurement</p> <p>18 within the past year?</p> <p>19 <b>A No.</b></p> <p>20 Q Was he responsible for e-Procurement in</p> <p>21 fiscal year 2007?</p> <p>22 <b>A Fiscal year 2007? You mean Lawson fiscal</b></p>

<p>25</p> <p>1 year?</p> <p>2 Q Correct.</p> <p>3 A Yes. He was.</p> <p>4 Q Was he responsible for e-Procurement</p> <p>5 within Lawson's fiscal year 2008?</p> <p>6 A I need to check my records to get the</p> <p>7 proper dates, if it's very important.</p> <p>8 Q What is Mr. Gledhill's position?</p> <p>9 A He is global director for M3</p> <p>10 applications. And team leader.</p> <p>11 Q Is there a particular team that he is the</p> <p>12 leader of?</p> <p>13 A Yes.</p> <p>14 Q What's that team?</p> <p>15 A Product managers in the M3 business unit.</p> <p>16 Q What are Mr. Gledhill's responsibilities</p> <p>17 as global director for M3 applications?</p> <p>18 A He is the team leader of my product</p> <p>19 managers, that John Gledhill holistically have the</p> <p>20 responsibility of our M3 applications.</p> <p>21 Q What were the nature of your discussions</p> <p>22 with Mr. Rasmussen?</p>	<p>27</p> <p>1 their names?</p> <p>2 A His team members' names?</p> <p>3 Q Correct.</p> <p>4 A We can start with Alfred Gerum, Vickie</p> <p>5 Hyde, Brian Dunks, Joel Groer, and David Beckett,</p> <p>6 Madeleine Van Dijk. And I would like to look at</p> <p>7 your list.</p> <p>8 Q What's Mr. -- I think you said Gerhart,</p> <p>9 what is his position?</p> <p>10 A Gerum. Alfred Gerum is on sick leave.</p> <p>11 And his position is that he is today product</p> <p>12 manager of e-Procurement.</p> <p>13 Q What is --</p> <p>14 A Hence my conversation with Ole Rasmussen.</p> <p>15 Q What is Ms. Hyde's position?</p> <p>16 A She is senior product manager and</p> <p>17 responsible for our applications and solution for</p> <p>18 Lawson for fashion.</p> <p>19 Q What is Mr. Dunks's position?</p> <p>20 A He is responsible for our applications</p> <p>21 and solution for the ESM in all industries;</p> <p>22 equipment, service, management, and rental</p>
<p>26</p> <p>1 A Maybe I should ask you to define "the</p> <p>2 nature."</p> <p>3 Q When you indicated that you had talked to</p> <p>4 Mr. Rasmussen in order to prepare for the</p> <p>5 deposition, what were the nature of your</p> <p>6 discussions that you had with Mr. Rasmussen in</p> <p>7 order to prepare for the deposition?</p> <p>8 A Confirm and -- confirm the demonstrations</p> <p>9 that was asked for in your letter, to secure that I</p> <p>10 could deliver that in the best possible manner.</p> <p>11 Q Is that the only topic that you discussed</p> <p>12 with Mr. Rasmussen in order to prepare for your</p> <p>13 deposition?</p> <p>14 A You have to define "only." That's the</p> <p>15 main topic we talked about.</p> <p>16 Q What were the other topics that you</p> <p>17 discussed with Mr. Rasmussen in order to prepare</p> <p>18 for your deposition?</p> <p>19 A I would say none.</p> <p>20 Q With respect to Mr. Gledhill and his</p> <p>21 position as team leader, who are the project</p> <p>22 managers over whom he is the leader? What are</p>	<p>28</p> <p>1 industry.</p> <p>2 Q What is Mr. Groer's position?</p> <p>3 A Joel Groer, he is responsible for parts</p> <p>4 of our applications in our manufacturing and</p> <p>5 distribution area. He's focused on the</p> <p>6 distribution side.</p> <p>7 Q What is Mr. Beckett's position?</p> <p>8 A The same as Joel, but focused on</p> <p>9 manufacturing.</p> <p>10 Q What is Ms. Van Dijk's position?</p> <p>11 A She is a new employee who is about to</p> <p>12 replace Vickie Hyde, who is retiring at the end of</p> <p>13 this month.</p> <p>14 Q In addition to your discussions with</p> <p>15 Mr. Rasmussen and Mr. Gledhill in order to prepare</p> <p>16 for the deposition, did you have meetings with any</p> <p>17 other individuals to prepare for the deposition?</p> <p>18 A No.</p> <p>19 Q What were the nature of your discussions</p> <p>20 with Mr. Gledhill in order to prepare for the</p> <p>21 deposition?</p> <p>22 A Again, in preparation of what might be a</p>

<p>29</p> <p>1 demonstration, the M3 solution really in the area</p> <p>2 of procurement, or the areas I'm about to give</p> <p>3 testimony to, is really sort of one core</p> <p>4 application, one core solution, and it's</p> <p>5 e-Procurement. And we talked about what we call</p> <p>6 the Business Engine part of our solution in</p> <p>7 procurement.</p> <p>8 Q What do you mean by the business end of</p> <p>9 your solution?</p> <p>10 A Sorry, "the Business Engine."</p> <p>11 Q "The Business Engine." Can you describe</p> <p>12 for me the functionality of the Business Engine of</p> <p>13 the solution?</p> <p>14 A To be blunt, that would take five hours</p> <p>15 or three days. The reason why I mentioned Business</p> <p>16 Engine is M3 has a core application that I refer to</p> <p>17 as the name "Business Engine." And then we have a</p> <p>18 bolted on solution which is called e-Procurement.</p> <p>19 Q Can you just describe for me at a high</p> <p>20 level the functionality of the Business Engine?</p> <p>21 A It is our European solution for</p> <p>22 manufacturing and distribution that covers business</p>	<p>31</p> <p>1 A It is to lead a team that formulates our</p> <p>2 industry strategy and application strategy to</p> <p>3 supply our customers in the M3 arena with a</p> <p>4 solution.</p> <p>5 Q Who reports to you in your position as VP</p> <p>6 of M3 industries?</p> <p>7 A Who, individuals that reports to me?</p> <p>8 Q Correct.</p> <p>9 A Ole Rasmussen, John Gledhill, Lars</p> <p>10 Bremer, David Walsh.</p> <p>11 Q Are there any others?</p> <p>12 A No.</p> <p>13 Q What is Mr. Bremer's position?</p> <p>14 A He is global director and responsible for</p> <p>15 our financials, M3 financials and regulatory and</p> <p>16 statutory requirements.</p> <p>17 Q What is Mr. Walsh's position?</p> <p>18 A He is responsible for our mobile</p> <p>19 solutions.</p> <p>20 Q To whom do you report in the position of</p> <p>21 VP of M3 industries?</p> <p>22 A Today?</p>
<p>30</p> <p>1 applications from procurement to manufacturing into</p> <p>2 sales, only aimed for manufacturing and</p> <p>3 distribution companies.</p> <p>4 Q Besides your review of online</p> <p>5 documentation and your review of some documents and</p> <p>6 these discussions you had with your two -- with</p> <p>7 Mr. Rasmussen and Mr. Gledhill, did you do anything</p> <p>8 else in order to prepare for your deposition today?</p> <p>9 A Only that I myself went over the</p> <p>10 solutions.</p> <p>11 Q And how did you undertake your review of</p> <p>12 the solutions? What did you do?</p> <p>13 A In preparation of the demonstration, I</p> <p>14 just looked at what might be part of the</p> <p>15 demonstration.</p> <p>16 Q Let's switch gears a little bit. Can</p> <p>17 you -- well, first of all, what's your current</p> <p>18 position as Lawson Software?</p> <p>19 A I'm vice president of M3 industries and</p> <p>20 application product management.</p> <p>21 Q What are your responsibilities in that</p> <p>22 position?</p>	<p>32</p> <p>1 Q Yes.</p> <p>2 A Eric Vermiaut. I was just contemplating</p> <p>3 whether he's an executive vice president or senior</p> <p>4 vice president. I don't know, I forgot.</p> <p>5 Q Can you describe for me your educational</p> <p>6 background, starting after high school or after</p> <p>7 secondary school, if you will.</p> <p>8 A You have to define a bit more. I'm</p> <p>9 European, so I never went to high school.</p> <p>10 Q Can you describe for me your educational</p> <p>11 background beginning with university education.</p> <p>12 A Beginning with university?</p> <p>13 Q Correct.</p> <p>14 A I have a master degree in electrical</p> <p>15 engineering and industrial management, and after</p> <p>16 that I didn't take any other degrees. And that is,</p> <p>17 in my understanding, my university education.</p> <p>18 Q From what educational institution did you</p> <p>19 receive your degree?</p> <p>20 A Linköping Tekniska Högskola. LITH. It's</p> <p>21 a cooperative curriculum with MIT.</p> <p>22 Q In what year did you receive your degree?</p>

<p>33</p> <p>1       <b>A 1984.</b></p> <p>2       Q   What was your first employment position</p> <p>3       following graduation from the university?</p> <p>4       <b>A Define "first."</b></p> <p>5       Q   Did you assume employment following</p> <p>6       graduation from the university?</p> <p>7       <b>A Yes.</b></p> <p>8       Q   And what was the position that you</p> <p>9       assumed?</p> <p>10      <b>A I -- it's like this, Sk?nska Lantm?nnen,</b></p> <p>11      <b>a Swedish company called Sk?nska Lantm?nnen, as</b></p> <p>12      <b>assistant plant manager. I held other positions,</b></p> <p>13      <b>but they were minor positions.</b></p> <p>14      Q   And how long were you in the position as</p> <p>15      assistant plant manager?</p> <p>16      <b>A Roughly two years.</b></p> <p>17      Q   Two weeks?</p> <p>18      <b>A Years.</b></p> <p>19      Q   Oh, sorry. Okay. What were your</p> <p>20      responsibilities as assistant plant manager?</p> <p>21      <b>A To be quite frank, I'm not sure I fully</b></p> <p>22      <b>recollect the job description at the time.</b></p>	<p>35</p> <p>1       Q   Oh, okay.</p> <p>2       <b>A So my job description was not in one</b></p> <p>3       <b>page.</b></p> <p>4       Q   What types of activities did you perform</p> <p>5       when you first started Intentia?</p> <p>6       <b>A First?</b></p> <p>7       <b>Q What was the nature of your day to day</b></p> <p>8       <b>job? What types of activities did you engage in?</b></p> <p>9       <b>A In the beginning of Intentia I engaged in</b></p> <p>10      <b>sales, implementations of what is -- ERP didn't</b></p> <p>11      <b>exist at the time, and in Europe those kinds of</b></p> <p>12      <b>systems was called MPM systems. So I hold a</b></p> <p>13      <b>responsibility for our MPM, the manufacturing side</b></p> <p>14      <b>of our MPM system, and I sold and installed it</b></p> <p>15      <b>You know, as a co-founder you do pretty much</b></p> <p>16      <b>everything.</b></p> <p>17      <b>But the early years was heavily geared</b></p> <p>18      <b>towards sort of -- part from business development</b></p> <p>19      <b>implementing solutions.</b></p> <p>20      Q   At some point in time did you assume some</p> <p>21      sort of official title within Intentia as the</p> <p>22      company grew?</p>
<p>34</p> <p>1       Q   What type of products were being</p> <p>2       manufactured at the plant?</p> <p>3       <b>A Animal food. Plants, plural.</b></p> <p>4       Q   Following your position as assistant</p> <p>5       plant manager, what was your next employment</p> <p>6       position?</p> <p>7       <b>A At Intentia.</b></p> <p>8       <b>Q What year did you assume employment with</b></p> <p>9       <b>Intentia?</b></p> <p>10      <b>A Yes, that is actually a bit of a trick</b></p> <p>11      <b>question, because I did start work at a certain</b></p> <p>12      <b>date, that I very much recall. But my official</b></p> <p>13      <b>registration date, because of various ownership</b></p> <p>14      <b>positions, is June 1st of 1985. But I did start</b></p> <p>15      <b>working with Intentia already in February of 1984.</b></p> <p>16      <b>I think it's relevant information -- irrelevant</b></p> <p>17      <b>information. But it's the facts.</b></p> <p>18      <b>Q What was the first position that you held</b></p> <p>19      <b>in Intentia?</b></p> <p>20      <b>A I don't dare to recall it as a position.</b></p> <p>21      <b>It was a startup. So we were -- I was a</b></p> <p>22      <b>co-founder.</b></p>	<p>36</p> <p>1       <b>A Yes. Yes.</b></p> <p>2       Q   What was the first official title that</p> <p>3       you held at Intentia?</p> <p>4       <b>A I honestly don't -- can't tell you what</b></p> <p>5       <b>my first official title is. Of course I can if</b></p> <p>6       <b>it's relevant, I can go over what I did</b></p> <p>7       <b>historically at Intentia. But I don't recall my</b></p> <p>8       <b>first title.</b></p> <p>9       Q   That's fine. I'm just trying to step</p> <p>10      through the types of positions that you've held up</p> <p>11      until today.</p> <p>12      <b>A Over the time, I've been in the European</b></p> <p>13      <b>industry now almost 25 years, and I've been in</b></p> <p>14      <b>implementations, I've been in sales, I've been in</b></p> <p>15      <b>marketing, I've been in partner relationships, I've</b></p> <p>16      <b>been in what we call solution consulting or</b></p> <p>17      <b>presales. And I have always have had a strong foot</b></p> <p>18      <b>in development, but sometimes directly as president</b></p> <p>19      <b>of the development organization, but also as</b></p> <p>20      <b>product management of capturing requirement and</b></p> <p>21      <b>driving development.</b></p> <p>22      <b>So I can very much say that I've been in</b></p>



<p>37</p> <p>1 leadership positions in all our activities as an</p> <p>2 ERP organization over these 25 years.</p> <p>3 Q What was the position that you held at</p> <p>4 Intenia when Intenia was acquired by Lawson</p> <p>5 Software?</p> <p>6 A I was president of Intenia R&amp;D.</p> <p>7 Q And what were your responsibilities as</p> <p>8 president of Intenia R&amp;D?</p> <p>9 A I had the research and development</p> <p>10 organization as my responsibility for Intenia.</p> <p>11 Q At the current point in time, how many</p> <p>12 employees, if you know, have responsibilities</p> <p>13 related to the M3 product line?</p> <p>14 A That -- first you have to define</p> <p>15 "responsibility." And then I think I'm going to</p> <p>16 have -- maybe I can answer, but I think it would be</p> <p>17 hard for me to get an exact number.</p> <p>18 Q For what Lawson facilities, in what</p> <p>19 Lawson facilities are activities engaged in that</p> <p>20 have relationship to the M3 product line?</p> <p>21 A Still too weak. I need much more</p> <p>22 definition.</p>	<p>39</p> <p>1 Because they might have individuals in all our</p> <p>2 locations. I also have people in home offices.</p> <p>3 Q So who would you defer those questions</p> <p>4 to?</p> <p>5 A Today it would be Gunther Tolkmitt.</p> <p>6 Q Pardon me?</p> <p>7 A Our leader of --</p> <p>8 Q Oh, okay, Mr. Tolkmitt. Where are</p> <p>9 marketing activities engaged with respect to the M3</p> <p>10 product line, in what facilities?</p> <p>11 A In all our facilities where we sell M3.</p> <p>12 I would say again, I would like to defer that</p> <p>13 question, if you're asking for the org structure of</p> <p>14 the marketing, to anybody who was responsible for</p> <p>15 the marketing.</p> <p>16 Q And who would you ask in the marketing</p> <p>17 department if you needed to know the answer to that</p> <p>18 question?</p> <p>19 A Travis White, ultimately.</p> <p>20 Q Where are sales personnel located that</p> <p>21 have responsibilities for sales of M3 product line?</p> <p>22 A Throughout our geographies where we sell.</p>
<p>38</p> <p>1 Q In what Lawson locations are activities</p> <p>2 conducted that are relevant to the M3 product line?</p> <p>3 A What locations?</p> <p>4 Q Correct.</p> <p>5 A That might also be a difficult question,</p> <p>6 since much of our activity is project-related, so</p> <p>7 we have a project running with a customer, and then</p> <p>8 your customer's site. And you're definitely</p> <p>9 engaged with a customer to -- with respect of M3</p> <p>10 and the capabilities of M3 and making jointly with</p> <p>11 that customer that project running. So that could</p> <p>12 be anywhere in the world, more or less, where we</p> <p>13 sell our solution.</p> <p>14 Q Is there a particular Lawson facility</p> <p>15 where the research and development activities are</p> <p>16 conducted with reference to the M3 product line?</p> <p>17 A There are -- yes, there is.</p> <p>18 Q Where are those activities conducted?</p> <p>19 A They are conducted in -- since it</p> <p>20 actually is a spread organization, and I'm not</p> <p>21 fully responsible for it today, I would like to</p> <p>22 defer that question to those who are responsible.</p>	<p>40</p> <p>1 And again, their physical location, some report to</p> <p>2 an office, some have home offices. Again, I think</p> <p>3 if you want to have specific details on how the</p> <p>4 sales organization is organized, I would like to</p> <p>5 defer that to someone who is responsible for that</p> <p>6 sales organization.</p> <p>7 Q Who would you ask for the answer to that</p> <p>8 question if you needed to determine that?</p> <p>9 A I -- if I --</p> <p>10 Q Who would you look to, who would you</p> <p>11 call?</p> <p>12 A I would say that you need to contact two</p> <p>13 parts of our organization, if you talk about the M3</p> <p>14 side.</p> <p>15 Q And who would you contact?</p> <p>16 A It would be Eric Vermiaut, and Arnold</p> <p>17 Descasin.</p> <p>18 Q And what is Mr. Vermiaut, what is his</p> <p>19 position?</p> <p>20 A He is the guy I report to.</p> <p>21 Q What is his --</p> <p>22 A Either senior vice president or executive</p>

<p>41</p> <p>1 vice president for M3 industries.</p> <p>2 Q Where is he located?</p> <p>3 A He works out of the Paris office.</p> <p>4 Q And what is Mr. Descasin's title?</p> <p>5 A He is -- he's a general manager of our</p> <p>6 business unit for manufacturing and distribution.</p> <p>7 And he works out of also the Paris office.</p> <p>8 Q How is the M3 product line distributed to</p> <p>9 a customer that licenses the products?</p> <p>10 A Define "distributed."</p> <p>11 Q How would a customer -- if a customer had</p> <p>12 entered into a license for the M3 ERP product, how</p> <p>13 would Lawson get that, the applications to them?</p> <p>14 How would they receive that?</p> <p>15 A We have an office that handles all our</p> <p>16 distribution which reports to our CFO. And a</p> <p>17 little bit depending on application, because some</p> <p>18 of our applications are different, and physically</p> <p>19 distributed in different manners. But it will all</p> <p>20 be managed through our shipment office.</p> <p>21 Q Where is that shipment office located?</p> <p>22 A In Saint Paul.</p>	<p>43</p> <p>1 Manufacturing would be another. Maintenance,</p> <p>2 Financials, and CRM. Since...</p> <p>3 Q So under the suite level, would there be</p> <p>4 applications, is that --</p> <p>5 A There would be applications.</p> <p>6 Q So what are the different applications in</p> <p>7 the Supply Chain Management suite?</p> <p>8 A I'm not prepared to list them on top of</p> <p>9 my head. There is a total of over -- almost 170</p> <p>10 applications in the M3 suite. So I would have to</p> <p>11 have our product order form or product</p> <p>12 configuration in front of me to give a detailed</p> <p>13 answer to that.</p> <p>14 Q Is there a Supply Chain Planning</p> <p>15 application within the Supply Chain Management</p> <p>16 suite?</p> <p>17 A There is a Supply Chain Planner, yes.</p> <p>18 Q Can you describe at a high level the</p> <p>19 functionality of the Supply Chain Planning</p> <p>20 application?</p> <p>21 A It is an application that uses</p> <p>22 algorithms, dash -- algorithms to optimize supply</p>
<p>42</p> <p>1 Q And with respect to the e-Procurement</p> <p>2 application within the M3 product line, how is that</p> <p>3 application distributed to a customer?</p> <p>4 A To be honest, I'm not sure whether it's a</p> <p>5 CD or downloadable today. I can't answer that.</p> <p>6 Q Who would you contact to determine that?</p> <p>7 A I would contact our distribution office</p> <p>8 to determine the details. That might vary from</p> <p>9 customer to customer as well, depending on what</p> <p>10 media they would like to receive this on, and their</p> <p>11 capabilities of receiving it. So it's -- it can</p> <p>12 vary. There is of course a standard way, probably.</p> <p>13 Q What are the different products that are</p> <p>14 in the M3 product line?</p> <p>15 A First -- we call it applications.</p> <p>16 Q Below the M3 product line, what would be</p> <p>17 the next level down? Would it be suites or</p> <p>18 applications?</p> <p>19 A It would be suites.</p> <p>20 Q Okay. What are the different suites</p> <p>21 within the M3 product line?</p> <p>22 A Supply Chain Management would be one.</p>	<p>44</p> <p>1 and demand. That's what it does on a high level.</p> <p>2 Q What do you mean by "optimize supply and</p> <p>3 demand"?</p> <p>4 A Where to supply your demand from. You</p> <p>5 have demands on products in quantity, defining</p> <p>6 quantity and time, and geographical aspects. Where</p> <p>7 should I supply those demands from.</p> <p>8 Q Is there a Demand Planning application</p> <p>9 within the Supply Chain Management suite?</p> <p>10 A Yes, there is.</p> <p>11 Q Can you describe at a high level the</p> <p>12 functionality of the Demand Planning application of</p> <p>13 the Supply Chain Management suite?</p> <p>14 A I just need to formulate myself so it</p> <p>15 doesn't take ten pages.</p> <p>16 Q Okay.</p> <p>17 A On a high level, the Demand Planning tool</p> <p>18 or tools are there to describe and calculate</p> <p>19 demands of products to be sold and distributed for</p> <p>20 any of our customers.</p> <p>21 Q Is there an Advanced Production Planner</p> <p>22 and Yield Optimizer application within the Supply</p>

<p>45</p> <p>1 Chain Management suite?</p> <p>2 A Yes, there is.</p> <p>3 Q Can you describe at a high level the</p> <p>4 functionality of that application?</p> <p>5 A There are actually two applications.</p> <p>6 Q What's the first one?</p> <p>7 A We can start with the Advanced Production</p> <p>8 Planner, which is utilizing the ideas of theory of</p> <p>9 constraint to make a sequenced plan of your</p> <p>10 manufacturing orders predominantly, based on</p> <p>11 demand, considering constraints such as resources</p> <p>12 and materials.</p> <p>13 Q And at a high level, what's the</p> <p>14 functionality of the Yield Optimizer application?</p> <p>15 A On a high level it's -- again, I just</p> <p>16 need to think, to formulate myself. It's meant to</p> <p>17 describe and plan for what yield you get out of the</p> <p>18 process that is predominantly using what we call</p> <p>19 reversed billable materials.</p> <p>20 You have sort of -- classically you have</p> <p>21 two types of production, you have assemble type</p> <p>22 of -- you bring things together or you have</p>	<p>47</p> <p>1 you can procure direct material to your</p> <p>2 manufacturing process and/or your distribution</p> <p>3 process, meaning that you have a demand somehow,</p> <p>4 either real life demand for a forecasted demand</p> <p>5 which is through MRP rules, calculations, generate</p> <p>6 a demand on various levels in your product</p> <p>7 structure, for procurement.</p> <p>8 And then when those demands needs to be</p> <p>9 settled with a procurement from a supplier, then</p> <p>10 the Procurement application steps in to handle the</p> <p>11 execution of that set -- said procurement process.</p> <p>12 Q Does the Procurement application include</p> <p>13 functionality to build a requisition?</p> <p>14 A I would like to ask you to define</p> <p>15 "requisition."</p> <p>16 Q A request for desired items.</p> <p>17 A Define "items."</p> <p>18 Q How would you define "items"?</p> <p>19 A Our requisition -- we have functionality</p> <p>20 to handle requisitions, and it's requisitions to</p> <p>21 handle stocked items, which is then our direct</p> <p>22 material, rarely used, if ever used, because most</p>
<p>46</p> <p>1 slaughtering or -- take one thing and reverse it so</p> <p>2 it becomes many parts, like in a slaughtering</p> <p>3 process of a pig or a chicken, for instance, you</p> <p>4 get chicken wings and legs and what have you out of</p> <p>5 one chicken, and that is reversed.</p> <p>6 Then you have a yield, what you get out,</p> <p>7 what are the residuals, what is the value of those</p> <p>8 residual. Some of them are usable and saleable,</p> <p>9 like chicken wings, of course, whereas there is</p> <p>10 something else that is not. And that product is</p> <p>11 aimed to support planning of those production</p> <p>12 processes to obtain the best possible yield of your</p> <p>13 production process.</p> <p>14 Q Is there a Procurement application within</p> <p>15 the Supply Chain Management suite?</p> <p>16 A To be 100 percent sure, I'm not sure if</p> <p>17 it's placed there or where it's placed. But there</p> <p>18 is a Procurement application in the M3 suite.</p> <p>19 Q Can you describe for me at a high level</p> <p>20 the functionality of the Procurement application?</p> <p>21 A The Procurement application in M3 is</p> <p>22 there to handle a result from MRP calculations so</p>	<p>48</p> <p>1 of the procurement, to say all of the procurement</p> <p>2 of direct materials is typically done through rules</p> <p>3 of ERP, so you don't need to put in a requisition</p> <p>4 in it.</p> <p>5 But there is a functionality, a very,</p> <p>6 very lean, very -- what should I call it -- I'm</p> <p>7 thinking of an English word that makes sense -- a</p> <p>8 very simplistic way of entering a requisition of</p> <p>9 direct material for procurement.</p> <p>10 Q So you explained --</p> <p>11 A But that requisition process is -- in the</p> <p>12 Procurement solution is totally without quantity</p> <p>13 control, whereas the role-based ERP procurement is</p> <p>14 totally based on quantities, available quantities</p> <p>15 and times. The Requisition process is just there</p> <p>16 to do anomalies, to do...</p> <p>17 Q So for example if your stock and</p> <p>18 inventory was low, would an inventory application</p> <p>19 generate some sort of replenishment type</p> <p>20 notification to warn you that you need to replenish</p> <p>21 your stock and inventory?</p> <p>22 A It will generate a replenishment signal</p>

<p>49</p> <p>1 and also a replenishment plant order, very much</p> <p>2 following some of -- yes. Yes. For stocked items.</p> <p>3 Q Right.</p> <p>4 A Only for stocked items. Direct material</p> <p>5 items.</p> <p>6 Q So this Procurement application that</p> <p>7 we've been speaking of, does it also have</p> <p>8 functionality to take that requisition through a</p> <p>9 work flow and upon approval, generate a purchase</p> <p>10 order?</p> <p>11 A I wouldn't phrase -- the way you phrased</p> <p>12 the question, is answer is no, because what we</p> <p>13 talked about was not a requisition process. It's</p> <p>14 a --</p> <p>15 Q It's an auto-replenishment type of</p> <p>16 process?</p> <p>17 A That I talked about earlier, yes. It's</p> <p>18 an auto-replenishment process. That doesn't</p> <p>19 require a requisition at all. There are planning</p> <p>20 messages according to -- yes.</p> <p>21 Q Is there an e-Procurement application</p> <p>22 within the Supply Chain Management suite?</p>	<p>51</p> <p>1 Q With respect to the procurement of</p> <p>2 indirect materials, does the e-Procurement</p> <p>3 application have the functionality to build a</p> <p>4 requisition for indirect materials desired?</p> <p>5 A Yes.</p> <p>6 Q And does it have the functionality to</p> <p>7 generate a purchase order from that requisition if</p> <p>8 the requisition has met appropriate approvals?</p> <p>9 A I wouldn't phrase it like that, because</p> <p>10 what happens is that sort of the requisition</p> <p>11 changes status into a purchase order when it's</p> <p>12 approved, always. There is no question, there is</p> <p>13 no gateway. And it's not called a purchase order.</p> <p>14 Q What is it called?</p> <p>15 A It's called a supplier order.</p> <p>16 Q Supplier order. So the system --</p> <p>17 A So it's not connected to the other</p> <p>18 purchase systems that we have.</p> <p>19 Q So the e-Procurement application will</p> <p>20 automatically create a supplier order if the</p> <p>21 requisition has been approved, is that correct?</p> <p>22 A Yes.</p>
<p>50</p> <p>1 A Again, to be 100 percent sure, I need to</p> <p>2 double-check where we placed it. But we do have an</p> <p>3 application called e-Procurement, yes.</p> <p>4 Q Can you describe for me at a high level</p> <p>5 the functionality of the e-Procurement application?</p> <p>6 A E-Procurement is a solution that is</p> <p>7 bolted on top of the Business Engine. But it's</p> <p>8 there to support the need for procurement of</p> <p>9 indirect material that you don't have in your</p> <p>10 stock, non-stocked items, and help in sort of</p> <p>11 requiring those items so that you can bring them to</p> <p>12 your own location. It's not meant to support any</p> <p>13 stock -- it doesn't support any stock levels, any</p> <p>14 kind of replenishment thinking at all.</p> <p>15 It is quite simplistic, straightforward</p> <p>16 way of requiring indirect material with -- it also</p> <p>17 holds Supplier Self-Service, where the idea is to</p> <p>18 secure that -- not to secure, but the idea is that</p> <p>19 those kinds of suppliers that you don't have for</p> <p>20 your direct material, that if you have enough of a</p> <p>21 relationship with them, that you could use -- share</p> <p>22 information with them in a Supplier Self-Service.</p>	<p>52</p> <p>1 Q In order to -- for the user to build a</p> <p>2 requisition, does the e-Procurement application</p> <p>3 have associated with it a database in which vendor</p> <p>4 catalog item data is located?</p> <p>5 MR. SCHULTZ: Objection, vague.</p> <p>6 THE WITNESS: Sorry?</p> <p>7 MR. SCHULTZ: You may answer.</p> <p>8 THE WITNESS: Okay. Can I take the</p> <p>9 question again?</p> <p>10 BY MS. ALBERT:</p> <p>11 Q In order for the user of the</p> <p>12 e-Procurement application to build a requisition,</p> <p>13 is there a database that can be searched to locate</p> <p>14 items that the user may wish to include on the</p> <p>15 requisition being built?</p> <p>16 MR. SCHULTZ: Objection. Vague.</p> <p>17 THE WITNESS: Yes.</p> <p>18 BY MS. ALBERT:</p> <p>19 Q You indicated that there's a Supplier</p> <p>20 Self-Service functionality associated with the</p> <p>21 e-Procurement application. Can you describe at a</p> <p>22 high level the nature of that functionality?</p>

<p>53</p> <p>1     <b>A</b>   It's -- the e-Procurement solution has --</p> <p>2     <b>it's meant to be used by different rules. So you</b></p> <p>3     <b>could be -- and if you are a supplier -- it's all</b></p> <p>4     <b>over Internet, so it's meant to be an Internet</b></p> <p>5     <b>application. So the supplier could go to Internet</b></p> <p>6     <b>and log on as a supplier, and then he will see the</b></p> <p>7     <b>purchase orders or supplier orders -- supplier</b></p> <p>8     <b>orders that has been generated to him, so he can</b></p> <p>9     <b>sort of execute on them.</b></p> <p>10    <b>And he can also as a supplier enter his</b></p> <p>11    <b>products that he wants -- if I say "us," I mean our</b></p> <p>12    <b>customer, then to procure from him. So he has to</b></p> <p>13    <b>sort of -- he can create his own list of items that</b></p> <p>14    <b>the other side then, the buyer, can look at. So</b></p> <p>15    <b>it's all located in sort of -- in our local</b></p> <p>16    <b>solution. The supplier enters himself what items</b></p> <p>17    <b>he wants us to buy from -- to buy.</b></p> <p>18    <b>Q</b>   So the supplier can upload his catalog of</p> <p>19    <b>items into the Supplier Self-Service center?</b></p> <p>20    <b>A</b>   <b>Vague, for me, when it comes to catalog,</b></p> <p>21    <b>because catalog is -- he can upload Excel</b></p> <p>22    <b>spreadsheets.</b></p>	<p>55</p> <p>1     Would that functionality be included?</p> <p>2     <b>A</b>   <b>Vague when you say "sending."</b></p> <p>3     <b>Q</b>   Would you be able to upload a supplier</p> <p>4     order confirmation back through that Supplier</p> <p>5     Self-Service functionality?</p> <p>6     <b>A</b>   <b>Again, a bit vague. If you can find a...</b></p> <p>7     <b>Q</b>   You said that there was functionality to</p> <p>8     <b>permit the supplier to respond to the supplier</b></p> <p>9     <b>order. How is that done?</b></p> <p>10    <b>A</b>   <b>Entering information directly into the</b></p> <p>11    <b>order. It's not sending anything. It's just</b></p> <p>12    <b>entering information. Confirming the delivery</b></p> <p>13    <b>date. Updating. Updating the supplier order. So</b></p> <p>14    <b>it's not a transactional system at all. There's no</b></p> <p>15    <b>transaction moving forwards and backwards per se.</b></p> <p>16    <b>Q</b>   Okay. Fair enough.</p> <p>17    <b>MS. ALBERT:</b> Let me have the reporter</p> <p>18    <b>mark as Billgren Exhibit 4 a copy of a PowerPoint</b></p> <p>19    <b>presentation entitled "Introduction to the Lawson</b></p> <p>20    <b>M3 Product Line." It bears production numbers LE</b></p> <p>21    <b>00146786 through 842.</b></p> <p>22    (Billgren Exhibit 4 was marked for</p>
<p>54</p> <p>1     <b>Q</b>   Okay. And the data that would be</p> <p>2     included in the Excel spreadsheet would be those</p> <p>3     items of the supplier that are available to the</p> <p>4     buyer using the e-Procurement application for</p> <p>5     requisition and ordering; is that correct?</p> <p>6     <b>A</b>   <b>A bit -- I'm not sure.</b></p> <p>7     <b>Q</b>   If the Lawson system user has entered</p> <p>8     into an agreement with the vendor, and pursuant to</p> <p>9     that agreement there are certain items that the</p> <p>10    buyer wishes to procure from the vendor, the vendor</p> <p>11    can then use this Supplier Self-Service</p> <p>12    functionality to upload an Excel spreadsheet</p> <p>13    including the data relating to those items; is that</p> <p>14    correct?</p> <p>15    <b>A</b>   <b>Yes.</b></p> <p>16    <b>Q</b>   Can the Supplier Self-Service</p> <p>17    functionality, does that also include functionality</p> <p>18    to permit the supplier to respond to a supplier</p> <p>19    order?</p> <p>20    <b>A</b>   <b>Yes.</b></p> <p>21    <b>Q</b>   Such as, for example, sending in an order</p> <p>22    confirmation type of a notice back to the buyer.</p>	<p>56</p> <p>1     identification and attached to the deposition</p> <p>2     transcript.)</p> <p>3     BY MS. ALBERT:</p> <p>4     <b>Q</b>   <b>Mr. Billgren, are you familiar with the</b></p> <p>5     <b>document that's been marked as Exhibit 4?</b></p> <p>6     <b>A</b>   <b>I am.</b></p> <p>7     <b>Q</b>   Do you know who authored this document?</p> <p>8     <b>A</b>   <b>To be -- I don't dare to say who is the</b></p> <p>9     <b>official author. I know who provided content for</b></p> <p>10    <b>it.</b></p> <p>11    <b>Q</b>   Who provided the content for this</p> <p>12    document?</p> <p>13    <b>A</b>   <b>To a high degree, my team.</b></p> <p>14    <b>Q</b>   Were there particular individuals from</p> <p>15    your team that provided content?</p> <p>16    <b>A</b>   <b>Not that I dare to name by name like</b></p> <p>17    <b>that.</b></p> <p>18    <b>Q</b>   What is the document that's been marked</p> <p>19    as Exhibit 4? What is it?</p> <p>20    <b>A</b>   <b>It's an introduction to the Lawson M3</b></p> <p>21    <b>product line.</b></p> <p>22    <b>Q</b>   What's the purpose for which this</p>

<p>57</p> <p>1 document is used?</p> <p>2 A It's a PowerPoint that allows us to</p> <p>3 describe over several hours what the M3 -- all</p> <p>4 application suites are all about on a high level.</p> <p>5 Q To whom would you give this type of</p> <p>6 presentation?</p> <p>7 A I would give this to someone who</p> <p>8 encounters M3 for the first time, possibly if they</p> <p>9 don't know what it is. And the recipient could be</p> <p>10 of various nature; customers, analysts, lawyers.</p> <p>11 Anybody who has not encountered the M3 product line</p> <p>12 before.</p> <p>13 Q Do you know when this document was</p> <p>14 created?</p> <p>15 A No.</p> <p>16 Q Do you know if this is the most current</p> <p>17 version of the presentation?</p> <p>18 A I dare not to say. We have -- it's an</p> <p>19 internal process where we post this document. And</p> <p>20 I dare not to say whether this is the latest.</p> <p>21 Q Where is this document maintained?</p> <p>22 A Define "where."</p>	<p>59</p> <p>1 Q Thank you. Can you turn to the page, it</p> <p>2 has page number 34 on the bottom of the slide, and</p> <p>3 it bears production number LE 00146819.</p> <p>4 A Yes.</p> <p>5 Q And the title on this page is "Supply</p> <p>6 Chain Management suite." Four paragraphs down on</p> <p>7 the slide, there's an indication of the modules</p> <p>8 that are included in the Supply Chain Management</p> <p>9 suite. Do you see that?</p> <p>10 A Yes, I see that. Sorry.</p> <p>11 Q So does that assist -- refresh your</p> <p>12 recollection as to all of the different modules or</p> <p>13 applications within the Supply Chain Management</p> <p>14 suite of the M3 product line?</p> <p>15 A These are examples, it's not a full list,</p> <p>16 it's examples of modules in the Supply Chain</p> <p>17 Management suite, yes.</p> <p>18 Q And you described earlier that the</p> <p>19 Procurement module is intended for procurement of</p> <p>20 your direct materials, is that how you would</p> <p>21 describe it?</p> <p>22 A Yes. I think I spent a fair amount of</p>
<p>58</p> <p>1 Q You said that this is posted internally.</p> <p>2 Where is it posted?</p> <p>3 A It's posted in what we call the Globe.</p> <p>4 Q What is the Globe?</p> <p>5 A It's our information structure.</p> <p>6 Q Do you know whether the Globe was</p> <p>7 searched for documents relevant to the M3 product</p> <p>8 line in order to collect documents to produce to</p> <p>9 ePlus in this litigation?</p> <p>10 A Yes. This comes from the Globe. The</p> <p>11 reason why I don't want to say whether it's the</p> <p>12 latest or not, because, I mean, there might have</p> <p>13 been a small change by someone within -- but this</p> <p>14 is the document that was -- that came. And when it</p> <p>15 was submitted, it was the latest.</p> <p>16 Q Okay. Thank you.</p> <p>17 A That I dare to say. But I don't dare to</p> <p>18 say whether there have been spell check or an error</p> <p>19 correction or whatever in the last week. So there</p> <p>20 might be an updated version, hence my hesitation.</p> <p>21 It's not that I don't believe that this is a valid</p> <p>22 document.</p>	<p>60</p> <p>1 words, I think they were the correct ones.</p> <p>2 Q Yes, if you could describe at a high</p> <p>3 level, what's the functional differences between</p> <p>4 the Procurement module and the e-Procurement</p> <p>5 module?</p> <p>6 A On a high level, it's -- sorry for</p> <p>7 repeating your question, but it's just --</p> <p>8 e-Procurement is there only to help very, very few</p> <p>9 of our customers to solve an issue where they need</p> <p>10 to have a requisition process for handling indirect</p> <p>11 material. It's not something we sell very often.</p> <p>12 And we might not even portray it in an up front</p> <p>13 presentation.</p> <p>14 Procurement, however, is something where</p> <p>15 I would say that almost all our customers have,</p> <p>16 because it's the replenished procurement process of</p> <p>17 securing it to have direct material. So on a high</p> <p>18 level, I would say that is the biggest difference.</p> <p>19 They -- yes.</p> <p>20 Q Is the M3 product line marketed to</p> <p>21 manufacturing type companies?</p> <p>22 A Vague on my behalf, because it's what we</p>

<p>61</p> <p>1 call the M3 type organizations.</p> <p>2 Q And what are those type of organizations?</p> <p>3 A I believe this document says it in the</p> <p>4 beginning. To speed up the process, I can</p> <p>5 summarize, it's the companies that either make,</p> <p>6 move, or maintain products. All in the -- with the</p> <p>7 ambition and aim to sell them or rent them to their</p> <p>8 customers, which is the main market space for M3.</p> <p>9 Whereas S3, which is not my responsibility, is to</p> <p>10 sort of staff with people and source with material</p> <p>11 to provide services. So it's a different market</p> <p>12 space. The M3 is Make, Move, Maintain.</p> <p>13 Q You indicated that e-Procurement has been</p> <p>14 sold to very few customers. Do you know currently</p> <p>15 how many customers there are for the e-Procurement</p> <p>16 application?</p> <p>17 A Again, a bit vague, how many. I know how</p> <p>18 many customers we have in the United States.</p> <p>19 Q Well, how many worldwide, first of all?</p> <p>20 A I don't dare to give you a number,</p> <p>21 because I don't have the exact number on the top of</p> <p>22 my head.</p>	<p>63</p> <p>1 remember.</p> <p>2 BY MS. ALBERT:</p> <p>3 Q Okay.</p> <p>4 A I can give you the name if you pass --</p> <p>5 no, maybe not. Empire --</p> <p>6 Q Empire something.</p> <p>7 A Blank blank North.</p> <p>8 MR. SCHULTZ: Why don't we check that at</p> <p>9 a break.</p> <p>10 MS. ALBERT: That's fine. Sure.</p> <p>11 BY MS. ALBERT:</p> <p>12 Q With respect to worldwide customers, are</p> <p>13 there some of those customers that have locations</p> <p>14 in the United States?</p> <p>15 A To my understanding no.</p> <p>16 Q So you know of no customer of</p> <p>17 e-Procurement that has any locations in the United</p> <p>18 States, other than Colony Liquor which is now known</p> <p>19 by a different name?</p> <p>20 A Correct.</p> <p>21 Q Is the e-Procurement application</p> <p>22 currently being marketed within the United States?</p>
<p>62</p> <p>1 Q Who would know that information?</p> <p>2 A I would, if I would be given time to</p> <p>3 double-check my data.</p> <p>4 Q Where would you need to check?</p> <p>5 A I would need to go to -- I don't know</p> <p>6 exactly what sources I need to check to turn out,</p> <p>7 because we have historical material that is not</p> <p>8 sort of earlier in Europe. So if the question is</p> <p>9 worldwide for me, it will require some</p> <p>10 investigation.</p> <p>11 Q How many customers of e-Procurement, of</p> <p>12 the M3 e-Procurement application are there in the</p> <p>13 U.S.?</p> <p>14 A One, to my knowledge.</p> <p>15 Q And what is that entity?</p> <p>16 A That entity --</p> <p>17 THE WITNESS: Is it okay for me to</p> <p>18 mention a customer name?</p> <p>19 MR. SCHULTZ: Yes.</p> <p>20 THE WITNESS: They used to be Colony</p> <p>21 Liquor, and now they are Empire -- this is one of</p> <p>22 the things I rehearsed, that I obviously don't</p>	<p>64</p> <p>1 A Yes, it's part of our offering.</p> <p>2 Q So it is being offered for sale within</p> <p>3 the United States; is that correct?</p> <p>4 MR. SCHULTZ: Objection to form. Legal</p> <p>5 conclusion. Vague.</p> <p>6 BY MS. ALBERT:</p> <p>7 Q You can answer.</p> <p>8 A You have to repeat the question again.</p> <p>9 MS. ALBERT: Can you read it back?</p> <p>10 (Requested portion of record read.)</p> <p>11 THE WITNESS: Yes.</p> <p>12 BY MS. ALBERT:</p> <p>13 Q Can you turn to page 39 of Exhibit 4.</p> <p>14 And the Bates number ends with 824. Are you there?</p> <p>15 A Yes.</p> <p>16 Q Under the heading "e-Procurement," the</p> <p>17 first bullet reads, "Manages all your need for</p> <p>18 indirect procurement." What's meant by the term</p> <p>19 "indirect procurement"?</p> <p>20 A It's meant what I -- what we in our</p> <p>21 conversation used, to procure indirect material.</p> <p>22 Q What do you mean by "indirect materials"?</p>

<p>65</p> <p>1 A I mean material that you don't use in</p> <p>2 your value added process of manufacturing or --</p> <p>3 material that is not used directly to add to the</p> <p>4 end product that you aim to sell to your customer</p> <p>5 directly. Because, I mean, office equipment is</p> <p>6 indirectly sort of helping. But direct material is</p> <p>7 sort of typically raw material ingredients, etc.</p> <p>8 Q The second bullet point under the heading</p> <p>9 e-Procurement reads, "Enables company-wide control</p> <p>10 of catalogs." How does the e-Procurement</p> <p>11 application enable company-wide control of</p> <p>12 catalogs?</p> <p>13 A It's -- the meaning here is what we have</p> <p>14 in the solution, which is the catalog or the</p> <p>15 indirect items that you -- if you want to manage</p> <p>16 your indirect items, e-Procurement will allow you</p> <p>17 to do that.</p> <p>18 Q Are those the items with which you have</p> <p>19 agreements with vendors?</p> <p>20 A It will allow you to establish a</p> <p>21 relationship with your supplier so that he can</p> <p>22 maintain those items on your behalf, so you can</p>	<p>67</p> <p>1 A I am -- I need to -- I am not 100 percent</p> <p>2 sure if, in that conjunction, that the requisition</p> <p>3 process is set up. And that's meant by multi-level</p> <p>4 of approval. Because it's more of a leveled</p> <p>5 approval of monies and quantities and -- rather</p> <p>6 than a passed on process, work flow type process</p> <p>7 level of approvals.</p> <p>8 Q The slide also indicates that "The</p> <p>9 e-Procurement application enables automated</p> <p>10 supplier collaboration processes." What supplier</p> <p>11 collaboration processes are enabled by the</p> <p>12 e-Procurement application?</p> <p>13 A Again, it is the over Internet, it's the</p> <p>14 automated assumption here, but it's the process of</p> <p>15 the supplier managing the items and receiving</p> <p>16 supplier orders over Internet in the Supplier</p> <p>17 Self-Service.</p> <p>18 Q Below those bullet points there's a</p> <p>19 depiction in the drawing there, within the block</p> <p>20 labeled "e-Procurement," there are three smaller</p> <p>21 blocks. One is labeled "Statistic Center."</p> <p>22 A Yes.</p>
<p>66</p> <p>1 later acquire them in the process of doing an</p> <p>2 indirect procurement.</p> <p>3 Q And you can import those items into an</p> <p>4 internal database for use within the application;</p> <p>5 is that correct?</p> <p>6 A Again, a bit vague, because, I mean,</p> <p>7 importing of the Excel or manual entry into the</p> <p>8 e-Procurement database which is a standalone,</p> <p>9 non-stocked item database for -- to be used in the</p> <p>10 indirect procurement process there.</p> <p>11 Q Can you turn to the slide on page 40 of</p> <p>12 the presentation. And that slide is entitled</p> <p>13 "Overview of M3 e-Procurement." The first bullet</p> <p>14 down states that "The M3 e-Procurement application</p> <p>15 includes full requisition management process with</p> <p>16 multi-level approval." What's meant by a full</p> <p>17 requisition management process?</p> <p>18 A The indication here is just to say that</p> <p>19 we have a requisition process.</p> <p>20 Q And you can set it up so a requisition</p> <p>21 would require multiple levels of approval, is that</p> <p>22 correct?</p>	<p>68</p> <p>1 Q One is labeled "Supplier Center," and one</p> <p>2 is labeled "Buy Center." Do you see that?</p> <p>3 A Yes.</p> <p>4 Q What is the Buy Center?</p> <p>5 A E-Procurement is sort of structured as a</p> <p>6 role-based application. So the Buy Center is then</p> <p>7 meant to indicate where you log on as a buyer to go</p> <p>8 in and acquire indirect material.</p> <p>9 Q To the right of the Buy Center it's</p> <p>10 showing employees and authorizers. Are those the</p> <p>11 types of roles that would be associated with the</p> <p>12 Buy Center?</p> <p>13 A Those are examples of roles that would be</p> <p>14 typically associated with the Buy Center, yes.</p> <p>15 Q And the functions that can be performed</p> <p>16 by individuals having those roles -- well, an</p> <p>17 individual having the role of employee, could that</p> <p>18 individual perform the function of requisitions?</p> <p>19 A Yes.</p> <p>20 Q And would a person having a role as an</p> <p>21 authorizer be able to perform the function of</p> <p>22 authorizations?</p>



<p>69</p> <p>1 A Yes.</p> <p>2 Q And who would have the capability of</p> <p>3 performing a function of order acknowledgements?</p> <p>4 A It's -- it is what happens when you do</p> <p>5 the authorization. As I indicated earlier, you</p> <p>6 create an order purchase -- a supplier order.</p> <p>7 Q Then there's a block within the</p> <p>8 e-Procurement block labeled as "Supplier Center."</p> <p>9 Is that the Supplier Self-Service center that we</p> <p>10 discussed earlier?</p> <p>11 A That's what it implies, yes.</p> <p>12 Q And so with respect to a purchase order,</p> <p>13 how is that function related to the Supplier</p> <p>14 Center?</p> <p>15 A As I said earlier, the authorization then</p> <p>16 sort of -- when a requisition is authorized, its</p> <p>17 status changes into a supplier order or a purchase</p> <p>18 order. And that is then displayed for the</p> <p>19 supplier, if he should log on to the Supplier</p> <p>20 Center. And he can view that and then act upon it</p> <p>21 to deliver.</p> <p>22 Q And the supplier can go in and indicate</p>	<p>71</p> <p>1 A To my understanding, the PowerPoint then</p> <p>2 indicates that sort of if you should have an</p> <p>3 external marketplace for several suppliers or etc.,</p> <p>4 then if you have a relationship with that external</p> <p>5 marketplace, then you can treat that external</p> <p>6 marketplace as a supplier, and then ask him or that</p> <p>7 legal entity, whatever it is, to do the same as the</p> <p>8 suppliers do.</p> <p>9 Q So the external marketplace can upload</p> <p>10 the spreadsheet of items to the Supplier Center?</p> <p>11 A They can use the same functionality of</p> <p>12 maintaining whatever items that -- the idea is that</p> <p>13 the supplier wants to display for the buyer.</p> <p>14 Q I think I'm done with that exhibit.</p> <p>15 MS. ALBERT: Is it a good time to take a</p> <p>16 short lunch break?</p> <p>17 MR. SCHULTZ: Yes, it would be.</p> <p>18 THE VIDEOGRAPHER: This marks the end of</p> <p>19 tape number 1 in the deposition of Mr. Billgren.</p> <p>20 Going off the record. The time is 12:38 p.m.</p> <p>21 (Whereupon, at 12:38 p.m., a lunch recess</p> <p>22 was taken.)</p>
<p>70</p> <p>1 confirmation of that order?</p> <p>2 A As I said, he can update that said</p> <p>3 supplier order with a confirmation date or just</p> <p>4 deliver the goods.</p> <p>5 Q To the left of the Supplier Center block,</p> <p>6 there is shown a number of suppliers. And then</p> <p>7 there's a description, "e-Catalog/Product Info."</p> <p>8 What's being depicted in the diagram by the</p> <p>9 "e-Catalog/Product Info" and the line drawn to the</p> <p>10 Supplier Center?</p> <p>11 A My understanding of the slide is that we</p> <p>12 mean that the supplier, through the Supplier</p> <p>13 Center, can provide, through the uploads of</p> <p>14 spreadsheets or manual entry, the list of items</p> <p>15 that he wants the employees on the other side in</p> <p>16 the Buy Center to be able to through a requisition</p> <p>17 buy from the supplier.</p> <p>18 Q And there's also shown an external</p> <p>19 marketplace, and then a line drawn to the Supplier</p> <p>20 Center. What's being depicted by the</p> <p>21 representation of the external marketplace with the</p> <p>22 line to the Supplier Center?</p>	<p>72</p> <p>1 AFTERNOON SESSION</p> <p>2 (1:12 p.m.)</p> <p>3 THE VIDEOGRAPHER: This marks the</p> <p>4 beginning of tape number 2 in the deposition of</p> <p>5 Mr. Billgren. We're now back on the record. The</p> <p>6 time is 1:13 p.m.</p> <p>7 BY MS. ALBERT:</p> <p>8 Q Good afternoon. Before the break, when</p> <p>9 you had discussed the e-Procurement application,</p> <p>10 you referenced that it was bolted on top of the</p> <p>11 Business Engine. In order to obtain a license to</p> <p>12 the e-Procurement application, would a customer</p> <p>13 also have to license the Business Engine?</p> <p>14 A No.</p> <p>15 Q Then why did you say that the</p> <p>16 e-Procurement application was bolted on top of the</p> <p>17 Business Engine?</p> <p>18 A Might be my misunderstanding of the</p> <p>19 English word "bolt" alone. What I meant with it,</p> <p>20 meant exactly that it is separated, meaning that</p> <p>21 you don't have to license them together. Typically</p> <p>22 e-Procurement is -- it's not tightly connected to</p>

<p>73</p> <p>1 M3 as such, the Business Engine as such. It can</p> <p>2 stay live very much separated.</p> <p>3 Q Do you need to license any other</p> <p>4 application in order to have -- make the</p> <p>5 e-Procurement application functional?</p> <p>6 A From Lawson, not -- you have to have the</p> <p>7 sort of the run time environment in place for the</p> <p>8 solution.</p> <p>9 Q What's the run time environment?</p> <p>10 A WebSphere in this case.</p> <p>11 (The reporter asked for clarification.)</p> <p>12 A WebSphere. IBM.</p> <p>13 Q Is there any other kind of connector or</p> <p>14 any other functionality that needs to be licensed</p> <p>15 in order to deploy the e-Procurement application?</p> <p>16 A No, it's a standalone license. It's sold</p> <p>17 as a standalone license. You don't need to sell it</p> <p>18 together.</p> <p>19 Q Has the e-Procurement application ever</p> <p>20 been known by any different names?</p> <p>21 A No, not to my knowledge and</p> <p>22 understanding.</p>	<p>75</p> <p>1 application might have technical versions which</p> <p>2 vary a lot.</p> <p>3 Q When did version 7.1 become commercially</p> <p>4 available?</p> <p>5 A It's been generally available since May</p> <p>6 2007. Then it's been enhancements over time.</p> <p>7 Q What was the first commercial version of</p> <p>8 the M3 e-Procurement application?</p> <p>9 A I don't -- that needs more definitions,</p> <p>10 because I can't answer that question.</p> <p>11 Q When was the e-Procurement -- strike</p> <p>12 that. I'll just go on. When was a module</p> <p>13 associated with the e-Procurement line having --</p> <p>14 strike that. What was the first commercially</p> <p>15 available version of an e-Procurement application</p> <p>16 associated with the M3 product line?</p> <p>17 A Still vague, since the M3 product line --</p> <p>18 the e-Procurement has been available since the</p> <p>19 foundation of the M3 product line.</p> <p>20 Q And when was the M3 product line first</p> <p>21 commercially available?</p> <p>22 A The M3 product line was first</p>
<p>74</p> <p>1 Q So back when you were with Intenia, was</p> <p>2 there an e-Procurement application being sold as an</p> <p>3 Intenia product?</p> <p>4 A You need to define that.</p> <p>5 Q Was there an application having</p> <p>6 functionality similar to the current M3</p> <p>7 e-Procurement application that was being sold as an</p> <p>8 Intenia product prior to the merger?</p> <p>9 A I don't think I can answer yes or no,</p> <p>10 because the e-Procurement product did exist before</p> <p>11 the merger between Intenia and Lawson.</p> <p>12 Q Was it known by that name, e-Procurement?</p> <p>13 A Yes.</p> <p>14 Q What is the current version of the M3</p> <p>15 e-Procurement application that is commercially</p> <p>16 available?</p> <p>17 A It's -- we call it the 7.1, under the M3</p> <p>18 7.1 version, brand.</p> <p>19 Q When -- I'm sorry.</p> <p>20 A Because I just want to say that up front,</p> <p>21 M3 7.1 is the umbrella versioning for all our</p> <p>22 applications. Then each and every individual</p>	<p>76</p> <p>1 commercially available with five -- I don't -- I</p> <p>2 need to -- I don't know. I need to double-check</p> <p>3 those dates.</p> <p>4 Q Who would you check with in order to</p> <p>5 determine that information?</p> <p>6 A I would just look up -- I would have to</p> <p>7 just clear my memory. That's all I have to do.</p> <p>8 Q Is there some specific documentation that</p> <p>9 you could consult to determine the answer to that</p> <p>10 question?</p> <p>11 A Yes.</p> <p>12 Q What documentation would that be?</p> <p>13 A Fastest would be -- for me is to look up</p> <p>14 a PowerPoint that we -- as part of my deposition.</p> <p>15 Q The PowerPoint that we've marked as an</p> <p>16 exhibit, you mean?</p> <p>17 A No.</p> <p>18 MS. ALBERT: Let me have the reporter</p> <p>19 mark as Billgren Exhibit 5 a presentation entitled</p> <p>20 "Lawson M3 e-Procurement." It bears production</p> <p>21 numbers L 0134163 through 202.</p> <p>22 (Billgren Exhibit 5 was marked for</p>

<p>77</p> <p>1 identification and attached to the deposition</p> <p>2 transcript.)</p> <p>3 BY MS. ALBERT:</p> <p>4 Q Are you familiar with the document that's</p> <p>5 been marked as Billgren Exhibit 5?</p> <p>6 A Yes. I am familiar with it.</p> <p>7 Q What is this document?</p> <p>8 A It is a PowerPoint, again, meant for</p> <p>9 sales to be able to present the e-Procurement</p> <p>10 application. Our internal sales.</p> <p>11 Q To whom would this presentation be given?</p> <p>12 A To whomever is interested in our</p> <p>13 e-Procurement offering.</p> <p>14 Q So it could be given to prospective</p> <p>15 customers?</p> <p>16 A Yes.</p> <p>17 Q It could be given to industry analysts?</p> <p>18 A Yes.</p> <p>19 Q Any other audiences for the presentation?</p> <p>20 A No, as I said, anybody who would be</p> <p>21 interested in our e-Procurement offering.</p> <p>22 Q Do you know when this document was</p>	<p>79</p> <p>1 earlier, on the Procurement solution, where the --</p> <p>2 you have the self-service side of the supplier,</p> <p>3 where he could sort of enter information, and also</p> <p>4 that the buyer, sort of he or she himself,</p> <p>5 themselves, order their own procurement through a</p> <p>6 requisition process.</p> <p>7 Q So the buyer can himself order their own</p> <p>8 desired items through the requisition process. Is</p> <p>9 that in contrast to some other type of procurement</p> <p>10 process?</p> <p>11 A You have to define "contrast."</p> <p>12 Q So is there another application for</p> <p>13 procurement that's not self-service in nature?</p> <p>14 A As I said earlier, the procurement</p> <p>15 typically for our customer base, the M3 type</p> <p>16 customers, it's a replenishment-based procurement</p> <p>17 of direct material which is not centered any kind</p> <p>18 of self-service or requisition type. It's...</p> <p>19 Q Okay. Can you turn to the slide on page</p> <p>20 4 of the presentation that ends with the Bates</p> <p>21 number ending 166. On the top of that slide,</p> <p>22 there's a heading reading "Integration to M3 Back</p>
<p>78</p> <p>1 created?</p> <p>2 A No.</p> <p>3 Q And on the right bottom corner of the</p> <p>4 first slide, there's a gentleman, Alfred Gerum, I</p> <p>5 think you mentioned him earlier. Do you know if he</p> <p>6 was the author of this presentation?</p> <p>7 A Yes.</p> <p>8 Q Yes, he was the author?</p> <p>9 A Yes.</p> <p>10 Q Do sales presentations, do they -- are</p> <p>11 they reviewed by anyone before they're finalized</p> <p>12 within your group?</p> <p>13 A They are typically reviewed and owned by</p> <p>14 the product manager.</p> <p>15 Q Who reviews these types of presentations</p> <p>16 before they're finalized?</p> <p>17 A The product manager.</p> <p>18 Q Can you turn to the second page of the</p> <p>19 exhibit that has the Bates number ending 164.</p> <p>20 What's meant by the term "self-service procurement"</p> <p>21 on that page?</p> <p>22 A It's meant to the two sides as described</p>	<p>80</p> <p>1 Office." What is the M3 Back Office?</p> <p>2 A It's meant to what I earlier referred to</p> <p>3 as the M3 Business Engine, which is -- yes.</p> <p>4 Q What's the functionality of the M3 Back</p> <p>5 Office or the M3 Business Engine?</p> <p>6 A As I said earlier, I gave it an holistic</p> <p>7 description. It's the entire ERP solution for M3</p> <p>8 that covers from procurement all the way through</p> <p>9 manufacturing and sales, as I said earlier.</p> <p>10 Q Why would you want to integrate the</p> <p>11 e-Procurement application with the M3 Back Office?</p> <p>12 A The main value for someone acquiring</p> <p>13 e-Procurement might not necessarily be the</p> <p>14 integration for purchase orders or order</p> <p>15 confirmation. But if we had a customer who runs M3</p> <p>16 as the back office or the ERP, we would like to</p> <p>17 offer some kind of integration. It could have been</p> <p>18 an SAP solution, it could have been any kind of</p> <p>19 solution connected to e-Procurement.</p> <p>20 Q So the e-Procurement application can</p> <p>21 connect to an ERP system of any other provider, in</p> <p>22 addition to connecting to the Lawson M3 ERP system,</p>

<p>81</p> <p>1 it can also be connected to an SAP ERP system or an</p> <p>2 Oracle ERP system?</p> <p>3 <b>A That needs to be refined. That's not</b></p> <p>4 <b>what I said.</b></p> <p>5 Q Okay. What did you mean by connecting to</p> <p>6 an SAP solution?</p> <p>7 <b>A What I meant is that the integration to</b></p> <p>8 <b>M3 Back Office, as we say here on this page 4,</b></p> <p>9 <b>means that we enable the e-Procurement solution to</b></p> <p>10 <b>connect to the traditional -- to the back office so</b></p> <p>11 <b>that we could use what we call invoice matching</b></p> <p>12 <b>inside the M3 Back Office solution or Business</b></p> <p>13 <b>Engine solution, even for procurement that has been</b></p> <p>14 <b>executed in e-Procurement in direct material.</b></p> <p>15 Q What is Invoice Matching?</p> <p>16 <b>A Invoice Matching is a function where you</b></p> <p>17 <b>receive the supplier's invoice and you match it</b></p> <p>18 <b>towards how much you have received of the goods</b></p> <p>19 <b>that was behind that invoice, and match to see how</b></p> <p>20 <b>much you are prepared to pay.</b></p> <p>21 Q Can you turn to page 9 of the</p> <p>22 presentation. And this slide is entitled "Savings</p>	<p>83</p> <p>1 increased number of steps to create a requisition</p> <p>2 than the e-Procurement application?</p> <p>3 <b>A On top of my head, a manual system.</b></p> <p>4 Q How does the use of the e-Procurement</p> <p>5 application make it easier for the requisitioner to</p> <p>6 make the right purchase decision?</p> <p>7 <b>A Again, it's a potential value in the area</b></p> <p>8 <b>of a process, whereas for instance -- so it relates</b></p> <p>9 <b>to what the customer or potential customer are</b></p> <p>10 <b>using today. Let's say it's a manual system, it's</b></p> <p>11 <b>really -- could be a really cumbersome process. I</b></p> <p>12 <b>could just imagine to go out and look in various</b></p> <p>13 <b>books and catalogs, physical catalogs or telephones</b></p> <p>14 <b>or whatever, to find out what to buy. And where we</b></p> <p>15 <b>have agreements with suppliers, etc.</b></p> <p>16 Q Could you turn to page 10 of the</p> <p>17 presentation. And on this diagram, there are a</p> <p>18 number of different functional blocks illustrated</p> <p>19 here as being associated with M3 e-Procurement.</p> <p>20 We've discussed some of these previously, but there</p> <p>21 are some new ones indicated. What's the</p> <p>22 functionality of the Statistics Center?</p>
<p>82</p> <p>1 through e-Procurement." Is this slide intended to</p> <p>2 describe all of the different types of savings or</p> <p>3 benefits associated with licensing the M3</p> <p>4 e-Procurement application?</p> <p>5 <b>A I would rephrase that. I would say that</b></p> <p>6 <b>the slide is intended to guide to certain areas</b></p> <p>7 <b>where there could be value for a potential customer</b></p> <p>8 <b>to use e-Procurement.</b></p> <p>9 Q So one of the values for a potential</p> <p>10 customer to use e-Procurement as described on this</p> <p>11 slide as being simpler and fewer steps to create a</p> <p>12 requisition, how does the e-Procurement application</p> <p>13 result in simpler and fewer steps to create a</p> <p>14 requisition?</p> <p>15 <b>A The reference to simpler and fewer steps</b></p> <p>16 <b>here needs of course to be balanced towards what</b></p> <p>17 <b>the customer have today. Hence I say these are</b></p> <p>18 <b>ideas for potential value. So it can never be in</b></p> <p>19 <b>its own context. It has to be in context with the</b></p> <p>20 <b>potential customer using today.</b></p> <p>21 Q So what type of system that the customer</p> <p>22 was using today might have more difficult or an</p>	<p>84</p> <p>1 <b>A Here it only represents an area to say</b></p> <p>2 <b>that you can get statistics reports.</b></p> <p>3 Q And that type of functionality comes with</p> <p>4 the e-Procurement application?</p> <p>5 <b>A Comes with report functionality, to print</b></p> <p>6 <b>reports.</b></p> <p>7 Q What types of reports can be generated</p> <p>8 using the e-Procurement application?</p> <p>9 <b>A You can -- how much you have bought from</b></p> <p>10 <b>one buyer, from one supplier, summarized</b></p> <p>11 <b>information of the transactions that has come down</b></p> <p>12 <b>in your requisition process.</b></p> <p>13 Q What's the functionality of the Business</p> <p>14 Center of the e-Procurement application?</p> <p>15 <b>A In this context I would say the Buy</b></p> <p>16 <b>Center represents -- because if I answer -- they</b></p> <p>17 <b>belong together here. The Buy Center on this slide</b></p> <p>18 <b>reflects towards how the buyer interacts with the</b></p> <p>19 <b>system. The Business Center is where the business</b></p> <p>20 <b>is, the authorization process, approvals of the</b></p> <p>21 <b>requisitions. It just reflects different rules to</b></p> <p>22 <b>the e-Procurement solution.</b></p>

<p>85</p> <p>1 Q In the middle of the diagram there's a</p> <p>2 dotted line. And to the left of the dotted line</p> <p>3 there is the Statistics Center, the Buy Center, the</p> <p>4 Business Center, and to the right of the dotted</p> <p>5 line is the Supply Center. What does that --</p> <p>6 what's that dotted line intended to represent?</p> <p>7 A The intention here on this slide is just</p> <p>8 to say that to the left hand side you have your</p> <p>9 internal functions, and on the right hand side you</p> <p>10 have your external suppliers operating through the</p> <p>11 Supply Center.</p> <p>12 Q Can you turn to the next page that has</p> <p>13 the Bates number ending 173. Again, there's a</p> <p>14 diagram of a Buy Center to the left of the dotted</p> <p>15 line and the Supply Center to the right of the</p> <p>16 dotted line. Within the Supply Center, there's</p> <p>17 shown a block representing supplier catalogs. Does</p> <p>18 this represent that the supplier can upload its</p> <p>19 supplier catalog into the M3 e-Procurement Supply</p> <p>20 Center?</p> <p>21 A The reference to supplier catalog is</p> <p>22 there to indicate that the supplier themselves</p>	<p>87</p> <p>1 diagram of the e-Procurement process. In the top</p> <p>2 left of the diagram there are a number of silos,</p> <p>3 representing catalogs. To the left are internal</p> <p>4 catalogs, and to the right are external catalogs.</p> <p>5 Can you explain how the M3 e-Procurement user can</p> <p>6 use e-Procurement to access external catalogs?</p> <p>7 A They cannot. So it's a representation</p> <p>8 here to describe that you have internal catalogs,</p> <p>9 and then in the case of e-Procurement, they are</p> <p>10 then maintained by your suppliers in a way so that</p> <p>11 the buyer, the requisitioner, can view them. The</p> <p>12 external catalogs could, for instance, be sort of</p> <p>13 connected to or used using the OCI, the Open</p> <p>14 Catalog Interface, the SAP developed interface.</p> <p>15 But we don't supply that as a functionality. It's</p> <p>16 more of a presentation of what exists in the</p> <p>17 market.</p> <p>18 Q What is the Open Catalog Interface?</p> <p>19 A It can only be my own understanding of</p> <p>20 it. You can Google it, you would find it. It's</p> <p>21 the SAP definition of a way to communicate with</p> <p>22 product catalogs of any supplier in this case to</p>
<p>86</p> <p>1 maintain the catalogs that can then be viewed in</p> <p>2 the Buy Center by the buyer.</p> <p>3 Q And then on the left, to the left of the</p> <p>4 dotted line, there is a block in the Buy Center</p> <p>5 that's labeled "Meta Catalog." What is a Meta</p> <p>6 Catalog?</p> <p>7 A In this context, it's meant to describe</p> <p>8 that the buyer in the internal process can view</p> <p>9 these catalogs from your suppliers whilst making</p> <p>10 his or her requisition.</p> <p>11 Q Are the supplier catalogs -- the data</p> <p>12 associated with the supplier catalogs loaded into</p> <p>13 some type of database so that in the -- the user</p> <p>14 accessing the application through the Buy Center</p> <p>15 can see a database having multiple supplier</p> <p>16 catalogs included in it?</p> <p>17 A I would phrase it like the purpose of</p> <p>18 mentioning "catalog" on the left side here in the</p> <p>19 internal process is that the buyer can view all the</p> <p>20 catalogs of your suppliers.</p> <p>21 Q Can you turn to the page with the Bates</p> <p>22 number ending 176. Illustrated on that page is a</p>	<p>88</p> <p>1 use.</p> <p>2 Q Does it have functionality similar to</p> <p>3 what Lawson refers to as Punchout functionality?</p> <p>4 A I wouldn't answer to that because it's --</p> <p>5 the OCI is not ours. We don't use them.</p> <p>6 Q Have you ever seen it being used?</p> <p>7 A How do you mean, "being used"?</p> <p>8 Q Have you ever seen the OCI functionality</p> <p>9 in operation?</p> <p>10 A Outside of e-Procurement, yes.</p> <p>11 Q Have you ever seen one of your</p> <p>12 e-Procurement customers utilizing the OCI</p> <p>13 functionality in conjunction with the e-Procurement</p> <p>14 application?</p> <p>15 A No. I have never.</p> <p>16 Q But so why are you representing on this</p> <p>17 slide a reference to OCI? What's the purpose for</p> <p>18 referencing that functionality on this slide?</p> <p>19 A The idea is just to explain that there</p> <p>20 are different types of catalogs. We handle one</p> <p>21 side of it, and we could potentially in the future</p> <p>22 do whatever, since the OCI is an Open Catalog</p>

<p>89</p> <p>1 Interface, open for anybody to connect to.</p> <p>2 And we don't offer that capability with</p> <p>3 e-Procurement, but -- again, with big disclaimers,</p> <p>4 it's not my interface, the OCI, it's owned by</p> <p>5 someone else, and it's been presented by SAP -- but</p> <p>6 anybody could use the OCI interface to achieve an</p> <p>7 external catalog, to get information for an</p> <p>8 external catalog.</p> <p>9 Q Does --</p> <p>10 A As long as the supplier has sort of</p> <p>11 created -- or secured that their catalog can be</p> <p>12 used by OCI. And I think -- just my professional</p> <p>13 opinion is that many sort of spare part -- or</p> <p>14 whatever type of products you have -- providers are</p> <p>15 following this standard since SAP is one of the</p> <p>16 dominant players.</p> <p>17 Q Does Lawson have any plans to include OCI</p> <p>18 functionality in its e-Procurement application in</p> <p>19 the future?</p> <p>20 A You have to define "plans." We have</p> <p>21 ideas and thoughts on what might happen in the</p> <p>22 future. We're not blind to the OCI situation.</p>	<p>91</p> <p>1 100 percent sure whether or not it has happened or</p> <p>2 not.</p> <p>3 Q Who would you ask to find out the answer</p> <p>4 to that question?</p> <p>5 A I would ask -- again, myself, just to</p> <p>6 clear up my memory again, to see whether we have</p> <p>7 done that.</p> <p>8 Q What would you need to do in order to</p> <p>9 refresh your recollection?</p> <p>10 A I would just need to give myself some</p> <p>11 time on it.</p> <p>12 Q Would there be any particular documents</p> <p>13 that you would review in order to refresh your</p> <p>14 recollection?</p> <p>15 A I would just check with my product</p> <p>16 manager, in this case Alfred, whether that has been</p> <p>17 progressed or not.</p> <p>18 MS. ALBERT: Counsel, we would request</p> <p>19 any documentation relating to future plans to</p> <p>20 enhance the e-Procurement application with the OCI</p> <p>21 functionality.</p> <p>22 MR. SCHULTZ: If it exists. We'll look</p>
<p>90</p> <p>1 Q Do you have any enhancements under</p> <p>2 development currently that would include having OCI</p> <p>3 functionality made available through the</p> <p>4 e-Procurement application?</p> <p>5 A We are viewing this as any requirement,</p> <p>6 OCI for any requirement in the future enhancement.</p> <p>7 It's not singled out as something very specific.</p> <p>8 Q So do you have any enhancements currently</p> <p>9 under development that would include adding OCI</p> <p>10 functionality to the e-Procurement application?</p> <p>11 A Define "development."</p> <p>12 Q Has there been some sort of requirements</p> <p>13 document drafted where somebody has identified the</p> <p>14 OCI functionality as a requirement for the product</p> <p>15 in the future?</p> <p>16 A I can't answer if we have a defined</p> <p>17 document that describes exactly that. But there is</p> <p>18 a requirement for the future, yes.</p> <p>19 Q Has the OCI functionality progressed</p> <p>20 beyond the requirement stage to design</p> <p>21 documentation?</p> <p>22 A It would be -- there are -- I wouldn't be</p>	<p>92</p> <p>1 into that.</p> <p>2 MS. ALBERT: Thank you.</p> <p>3 BY MS. ALBERT:</p> <p>4 Q Can you turn to the page of the</p> <p>5 presentation with the Bates number ending 180.</p> <p>6 This slide is entitled "Supply Center Process</p> <p>7 Flows." Can you explain the functionality of each</p> <p>8 process being represented by the arrows? And I</p> <p>9 guess let's take it one at a time. There's an</p> <p>10 arrow on the very left reading "Upload Catalog."</p> <p>11 Can you describe how that would be accomplished</p> <p>12 through the Supply Center?</p> <p>13 A That is where the supplier uploads a</p> <p>14 spreadsheet to the e-Procurement.</p> <p>15 Q So the supplier can use either an Excel</p> <p>16 spreadsheet or an XML document to upload its</p> <p>17 catalog into the Supply Center; is that correct?</p> <p>18 A Yes.</p> <p>19 Q And then the middle arrow reads,</p> <p>20 "Authorize." Could you describe what process is</p> <p>21 associated with the "Authorize" arrow?</p> <p>22 A That is when the supplier evaluates what</p>

<p>93</p> <p>1 he has just uploaded and approve, authorize, for it</p> <p>2 to be published to the buyers to use for</p> <p>3 requisition.</p> <p>4 Q So what's the process of publishing a</p> <p>5 Meta Catalog? Can you describe how that would</p> <p>6 happen?</p> <p>7 A When the supplier has approved the</p> <p>8 contents, the items, with the right price, that</p> <p>9 information is then viewable slash published for</p> <p>10 the audience of buyers.</p> <p>11 Q Can you turn to page 20 of the</p> <p>12 presentation. And that has the Bates number ending</p> <p>13 182. That slide is entitled "Create Requisition in</p> <p>14 M3 e-Procurement." What's illustrated on the</p> <p>15 screenshot shown on this page?</p> <p>16 A What part of the -- I mean...</p> <p>17 Q On the left hand side of the screenshot,</p> <p>18 what does that illustrate?</p> <p>19 A That illustrates the products that the</p> <p>20 buyer can require from in a structured way, using a</p> <p>21 product group structure.</p> <p>22 Q Okay. If someone -- if the user clicked</p>	<p>95</p> <p>1 A I wouldn't use "generic" and</p> <p>2 "descriptive." I would just say these are the</p> <p>3 product groups and the hierarchies that have been</p> <p>4 defined by the organization provided for the buyers</p> <p>5 to do these requisitions.</p> <p>6 Q Generally speaking, do the users have the</p> <p>7 most generic description of a product category as</p> <p>8 the top level product category, and then as a sub,</p> <p>9 and then drill down to more specific --</p> <p>10 A It makes sense when you say it, but I</p> <p>11 wouldn't say that it's depicted in the solution to</p> <p>12 do it like that.</p> <p>13 Q Why did you describe the product groups</p> <p>14 as a hierarchal structure?</p> <p>15 A It is an hierarchal structure. So they</p> <p>16 belong to each other.</p> <p>17 Q And on the right hand part of the screen,</p> <p>18 beneath "Requisition Details," what's the</p> <p>19 information being displayed there?</p> <p>20 A It's -- it's a requisition line. So</p> <p>21 you're viewing details of a line on a requisition.</p> <p>22 Q So is this displaying the requisition</p>
<p>94</p> <p>1 on the button labeled "Search," what would happen,</p> <p>2 what screen --</p> <p>3 A Then something else would happen, then we</p> <p>4 would actually leave this, and we get into search</p> <p>5 facility, where you search these products or items.</p> <p>6 Q And if a user clicked on one of the</p> <p>7 catalog products, product groups listed below, what</p> <p>8 screen would be presented? Say for example if the</p> <p>9 user clicked on the "Bearings" button there in the</p> <p>10 product group listing, what screen would be</p> <p>11 presented to the user?</p> <p>12 A Depending on where your hierarchy in the</p> <p>13 group would be, it would either display</p> <p>14 sub-sequence -- hierarchies of product groups, and</p> <p>15 when you're on the bottom level, it would present</p> <p>16 the products in the list.</p> <p>17 Q So the catalog products, product group</p> <p>18 listing on this screen, those are arranged</p> <p>19 hierarchically from the most generic description of</p> <p>20 a product group to -- and then you can drill down</p> <p>21 to the most specific description associated with an</p> <p>22 item; is that correct?</p>	<p>96</p> <p>1 that's being built by the system?</p> <p>2 A Yes.</p> <p>3 Q And in the top part, there is a</p> <p>4 requisition, the name of the person creating the</p> <p>5 requisition, the requisition number, and the</p> <p>6 delivery address; is that correct?</p> <p>7 A Yes.</p> <p>8 Q And then under the section labeled</p> <p>9 "Requisition Lines," there's an item that's been</p> <p>10 selected by the user that the user wishes to</p> <p>11 requisition; is that correct?</p> <p>12 A Yes, correct.</p> <p>13 Q Can you turn to the slide on the page</p> <p>14 with the Bates number ending 184. That slide is</p> <p>15 entitled "Review the Order in M3." Why would you</p> <p>16 want to review the order in M3?</p> <p>17 A Again, this is here to sort of be able to</p> <p>18 allow to speak to a full story, if you should</p> <p>19 decide that you want to have a shadow order in M3.</p> <p>20 Because e-Procurement in itself is a self-contained</p> <p>21 solution. It goes requisition, changes status to</p> <p>22 an order, the order is displayed for the suppliers.</p>

<p>97</p> <p>1 You can as a buyer receive the goods, say that I</p> <p>2 have it now.</p> <p>3 Then outside of e-Procurement you need to</p> <p>4 handle the financial side. This is then to say</p> <p>5 that if you want to connect with M3, we create a</p> <p>6 shadow purchase order for the benefit of being able</p> <p>7 to do what I said earlier, an invoice matching.</p> <p>8 But the full process of the requirements -- of</p> <p>9 fulfilling the requisition is handled in</p> <p>10 e-Procurement, apart from receiving the invoice</p> <p>11 from the supplier, because e-Procurement has</p> <p>12 nothing to do with the financial transaction.</p> <p>13 Q Can you turn to the page with the Bates</p> <p>14 number ending 193.</p> <p>15 A Yes.</p> <p>16 Q What's being illustrated on this slide</p> <p>17 entitled "Integration with M3 - Overview"?</p> <p>18 A It's -- this slide is a technical --</p> <p>19 combination of a technical description on how the</p> <p>20 APIs or any kind of integration between the</p> <p>21 e-Procurement and the M3 Business Engine, the word</p> <p>22 I used earlier, how that is done, in combination</p>	<p>99</p> <p>1 the database, otherwise you don't store anything.</p> <p>2 The database is used as a flat file</p> <p>3 system in the M3 solution. So everything is</p> <p>4 written in the database. Each of the shadow</p> <p>5 purchase orders are there, for instance.</p> <p>6 Q The catalog data from the Meta Catalog in</p> <p>7 the Buy Center, is that replicated in the M3</p> <p>8 database?</p> <p>9 A In short, no. Even though I wouldn't</p> <p>10 have used the word "Meta Catalog," but the</p> <p>11 information entered by the suppliers to allow the</p> <p>12 buyer or the requisitioner to do the requisitions</p> <p>13 in e-Procurement is not reflected in what is on</p> <p>14 this picture meant by the M3 database. It's a</p> <p>15 standalone out in e-Procurement.</p> <p>16 Q What's meant by the term "Master Data</p> <p>17 Application"?</p> <p>18 A In this perspective, it means that if you</p> <p>19 want to have a purchase order or an order</p> <p>20 confirmation, if you should choose to have that</p> <p>21 connection to the Business Engine, then some master</p> <p>22 data can be shared, like account numbers for the</p>
<p>98</p> <p>1 with what type of information carriers that is</p> <p>2 moved between the e-Procurement and the M3 Business</p> <p>3 Engine.</p> <p>4 Q What's the e-Collaborator application?</p> <p>5 A It is the front in the M3 Business Engine</p> <p>6 to, through XML, reach our APIs. When I mean ours,</p> <p>7 I mean the M3 Business Engine's APIs.</p> <p>8 Q What data is retained in the M3 database?</p> <p>9 A That is a huge question. The M3 database</p> <p>10 contains something of 3,000 plus database tables of</p> <p>11 everything from an Item Master to Customer Master,</p> <p>12 etc.</p> <p>13 Q Why would you need to connect the M3</p> <p>14 database to the e-Procurement application?</p> <p>15 A I wouldn't say you need to. But this</p> <p>16 PowerPoint here describes what typically would be</p> <p>17 the way, or it indicates that that could be a</p> <p>18 connection. Because everything, all the messages</p> <p>19 or the transactions that you sort of have the</p> <p>20 shadow purchase order, that of course exists in the</p> <p>21 database, because everything exists in the</p> <p>22 database, so that you have to have a connection to</p>	<p>100</p> <p>1 product groups, for instance. The items are not</p> <p>2 connected, really. You have to have -- the</p> <p>3 solution is you have to create a dummy item in the</p> <p>4 M3 database to get this running.</p> <p>5 MS. ALBERT: Let me ask the reporter to</p> <p>6 mark as Billgren Exhibit 6 a copy of a document</p> <p>7 entitled "Lawson M3 Enterprise Management System</p> <p>8 Application Overview." It bears production numbers</p> <p>9 L 0111978 through 2024.</p> <p>10 (Billgren Exhibit 6 was marked for</p> <p>11 identification and attached to the deposition</p> <p>12 transcript.)</p> <p>13 BY MS. ALBERT:</p> <p>14 Q Mr. Billgren, are you familiar with the</p> <p>15 document that's been marked as Exhibit 6?</p> <p>16 A Yes, I am.</p> <p>17 Q What is it?</p> <p>18 A It is an application overview of the M3</p> <p>19 Enterprise Management System in a written form</p> <p>20 rather than a PowerPoint.</p> <p>21 Q What is its purpose?</p> <p>22 A Again, to anybody who has not encountered</p>



<p>101</p> <p>1 M3, who wants to learn more about what the M3</p> <p>2 application or the product line consists of.</p> <p>3 Q So to whom is this document disseminated?</p> <p>4 A "Disseminated" means?</p> <p>5 Q To who would this document be</p> <p>6 distributed?</p> <p>7 A It is an internal document we use to</p> <p>8 explain to anybody who is interested in what M3</p> <p>9 application or product line consists of.</p> <p>10 Q Is an application overview a standard</p> <p>11 type of document that's maintained in the ordinary</p> <p>12 course of Lawson's business?</p> <p>13 A It is -- that is a "yes."</p> <p>14 Q Who is responsible for creating this</p> <p>15 application overview?</p> <p>16 A Product management -- the product manager</p> <p>17 of each area is producing the information for that</p> <p>18 area. Then I believe the entire document is put</p> <p>19 together by other people in our marketing</p> <p>20 department.</p> <p>21 Q And is this -- are these application</p> <p>22 overviews subject to any kind of review process</p>	<p>103</p> <p>1 consolidated applications overview?</p> <p>2 A I would again talk to -- my product</p> <p>3 manager, in this case John Gledhill.</p> <p>4 Q Can you turn to page 27 of the</p> <p>5 application overview.</p> <p>6 A Yes.</p> <p>7 Q And at the bottom of that page, there's a</p> <p>8 heading for "Lawson M3 e-Procurement." Do you see</p> <p>9 that heading?</p> <p>10 A Yes.</p> <p>11 Q And then continuing on to the next page,</p> <p>12 there are a number of different titles on that page</p> <p>13 including Buy Center, Supply Center, e-Procurement</p> <p>14 Business Center, e-Procurement Design Center Tools,</p> <p>15 and XML Application Adapter EPR.</p> <p>16 A Yes.</p> <p>17 Q Are these different modules or components</p> <p>18 within the e-Procurement application?</p> <p>19 A It's different deliverables within</p> <p>20 e-Procurement, yes.</p> <p>21 Q And do each of these deliverables come</p> <p>22 with the e-Procurement application as that</p>
<p>102</p> <p>1 before they're formally published?</p> <p>2 A Again, reviewed by the product manager.</p> <p>3 Q On the bottom right hand corner of the</p> <p>4 document, on the title page, it has a date, 2006.</p> <p>5 Do you know if there is a more current version of</p> <p>6 the application overview for the M3 system?</p> <p>7 A To my -- no, honestly, I don't honestly</p> <p>8 know whether there's been more. But to my</p> <p>9 understanding, this might be the most recent</p> <p>10 consolidated presentation.</p> <p>11 Q Who would you need to check with to</p> <p>12 determine if there is a more recent version of the</p> <p>13 M3 application overview document?</p> <p>14 A Again, I would need to refresh my own</p> <p>15 memories and just make sure.</p> <p>16 Q How would you go about refreshing your</p> <p>17 own memory to make sure?</p> <p>18 A I would in this case talk to see if we</p> <p>19 have published any more later existing consolidated</p> <p>20 applications overview.</p> <p>21 Q Where would you check to see if you had</p> <p>22 published any more or later version of the</p>	<p>104</p> <p>1 application is delivered?</p> <p>2 A I take back, I think I don't want to use</p> <p>3 the word "deliverables." I would rather say</p> <p>4 "modules."</p> <p>5 Q Do each of these modules come with the</p> <p>6 e-Procurement application as delivered?</p> <p>7 A Yes.</p> <p>8 Q What is the functionality associated with</p> <p>9 the e-Procurement Design Center Tools?</p> <p>10 A Each e-Procurement implementation is</p> <p>11 unique in how you would like the web page to look,</p> <p>12 because it's an Internet-based application. Each</p> <p>13 customer sort of internally would like to flavor it</p> <p>14 so it follows its colors or whatever. And the</p> <p>15 e-Procurement design center is a toolbox that</p> <p>16 allows implementation team or the customer to do</p> <p>17 that tailoring of the solution.</p> <p>18 Q And what's the functionality associated</p> <p>19 with the XML Application Adapter EPR?</p> <p>20 A It's used for the communication --</p> <p>21 elements of this is used, for instance, if the</p> <p>22 upload -- either through Excel or through an Excel</p>

<p>105</p> <p>1 document from the supplier perspective, but we're</p> <p>2 actually using it internally as well, if you want</p> <p>3 to connect to M3. Say you wouldn't like to M3, you</p> <p>4 wouldn't like to upload through XML, then you might</p> <p>5 question why you would like to have this adapter at</p> <p>6 all, because you might just use spreadsheets or</p> <p>7 manual updates.</p> <p>8 Q Thank you. I think I'm done with that</p> <p>9 exhibit.</p> <p>10 MS. ALBERT: Can we take a really short</p> <p>11 break?</p> <p>12 MR. SCHULTZ: Yes.</p> <p>13 THE VIDEOGRAPHER: We're going off the</p> <p>14 record. The time is 2:05 p.m.</p> <p>15 (Recess.)</p> <p>16 THE VIDEOGRAPHER: We're now back on the</p> <p>17 record. The time is 2:14 p.m.</p> <p>18 MS. ALBERT: I've handed the reporter a</p> <p>19 document entitled "Battle Card: Lawson M3</p> <p>20 e-Procurement, September 2007." It bears</p> <p>21 production numbers L 0134159 through 160. I would</p> <p>22 ask that that be marked as Billgren Exhibit 7.</p>	<p>107</p> <p>1 card?</p> <p>2 A It is authored by, again, product</p> <p>3 management, in collaboration with marketing, who is</p> <p>4 perhaps refining the document.</p> <p>5 Q Do you know if there is any more current</p> <p>6 version of the battle card than September 2007?</p> <p>7 A Again, I'm not 100 percent sure, but as I</p> <p>8 said earlier, to my understanding this is the</p> <p>9 latest version we have.</p> <p>10 Q Can you turn to the second page of the</p> <p>11 battle card.</p> <p>12 A Yes.</p> <p>13 Q In the middle column there is a heading</p> <p>14 entitled "Catalog Management." And the second</p> <p>15 point underneath the heading "Catalog Management"</p> <p>16 reads, "Support for connection to marketplaces."</p> <p>17 How does the M3 e-Procurement application provide</p> <p>18 support for connection to marketplaces?</p> <p>19 A As I said earlier, the only way we can do</p> <p>20 it today is that that marketplace as a supplier</p> <p>21 operates and allows -- and enters the area of</p> <p>22 products for the buyers, the requisitioners to</p>
<p>106</p> <p>1 (Billgren Exhibit 7 was marked for</p> <p>2 identification and attached to the deposition</p> <p>3 transcript.)</p> <p>4 BY MS. ALBERT:</p> <p>5 Q Mr. Billgren, are you familiar with the</p> <p>6 document that's been marked as Billgren Exhibit 7?</p> <p>7 A Yes, I am.</p> <p>8 Q What is it?</p> <p>9 A It's a battle card for the M3 Procurement</p> <p>10 solution which is meant to be potential arguments</p> <p>11 to be used in favor of positioning our</p> <p>12 e-Procurement solution.</p> <p>13 Q What's meant by the term "battle card"?</p> <p>14 A Since I am not native English, it might</p> <p>15 be a bit of an awkward explanation for me. But the</p> <p>16 idea is that our internally -- it's an internal</p> <p>17 document for our people, so that they should</p> <p>18 remember and learn and, maybe more importantly,</p> <p>19 remember the reasons why we have this solution and</p> <p>20 how they can position it as a value proposition to</p> <p>21 a potential customer.</p> <p>22 Q Do you know who authored this battle</p>	<p>108</p> <p>1 procure.</p> <p>2 Q And they would enter their products --</p> <p>3 A That marketplace, yes.</p> <p>4 Q -- through the Supply Center?</p> <p>5 A Yes. Thank you.</p> <p>6 Q Underneath the heading "How do I win,"</p> <p>7 there's a reference to tier 1 providers, SAP and</p> <p>8 Oracle. Does Lawson compete with SAP and Oracle</p> <p>9 for sales of the M3 e-Procurement application?</p> <p>10 A If we compete, they are two competitors,</p> <p>11 and they are here named as the tier 1 competitors.</p> <p>12 Q Who would be the tier 2 competitors for</p> <p>13 the sale of Lawson's e-Procurement application?</p> <p>14 A That would be local players.</p> <p>15 Q Do you have any tier 2 local players in</p> <p>16 the U.S. against whom Lawson competes for sales of</p> <p>17 the e-Procurement application?</p> <p>18 A No. Not really. We -- it's a stretch to</p> <p>19 say we compete, because we rarely sell the product.</p> <p>20 But it's to give an education or a highlight to our</p> <p>21 sales force, what they might be up against.</p> <p>22 Q Has Lawson engaged in any competitive</p>

<p>109</p> <p>1 analysis to analyze the U.S. market as it relates</p> <p>2 to trying to make sales of the e-Procurement</p> <p>3 application?</p> <p>4 <b>A No. Not to my knowledge.</b></p> <p>5 Q Underneath the heading "Service</p> <p>6 Providers," the second paragraph, the first</p> <p>7 sentence in the second paragraph reads, "Lawson</p> <p>8 charges customers a one-time user license fee plus</p> <p>9 annual maintenance." What's the one-time user</p> <p>10 license fee for the e-Procurement application?</p> <p>11 <b>A What do you mean by what? If you</b></p> <p>12 <b>define --</b></p> <p>13 Q What is the amount of the one-time user</p> <p>14 license fee for the e-Procurement application?</p> <p>15 <b>A It varies of size of the customer and</b></p> <p>16 <b>transactions.</b></p> <p>17 Q So what are the different ranges for the</p> <p>18 one-time license fee amount?</p> <p>19 <b>A And again, I need to refresh my memory of</b></p> <p>20 <b>what those, how do you say, steps are. I don't</b></p> <p>21 <b>have -- I have not learned them by heart.</b></p> <p>22 Q What would you need to refresh your</p>	<p>111</p> <p>1 services relating to the e-Procurement application?</p> <p>2 <b>A Yes.</b></p> <p>3 Q And what types of consulting services</p> <p>4 will Lawson provide relating to the e-Procurement</p> <p>5 application?</p> <p>6 <b>A It would provide the services of</b></p> <p>7 <b>education, like in all situations, project</b></p> <p>8 <b>management. We could also provide technical</b></p> <p>9 <b>consultants to help design these web pages.</b></p> <p>10 Q What is the nature of the services</p> <p>11 offered that you described as project management?</p> <p>12 <b>A It's a project manager who supervises</b></p> <p>13 <b>that all tasks that needs to be done to make</b></p> <p>14 <b>successful implementations are done.</b></p> <p>15 Q So Lawson will assist customers with the</p> <p>16 installation, configuration, and implementation of</p> <p>17 an e-Procurement application?</p> <p>18 <b>A If asked for, yes.</b></p> <p>19 Q Do you know how the consulting services,</p> <p>20 how those are priced?</p> <p>21 <b>A Being specific about e-Procurement, since</b></p> <p>22 <b>we have only done this once in the United States, I</b></p>
<p>110</p> <p>1 memory on that information?</p> <p>2 <b>A I would just need to sort of -- yes,</b></p> <p>3 <b>refresh my memory and check with either -- with my</b></p> <p>4 <b>product manager.</b></p> <p>5 Q Which product manager would you check</p> <p>6 with?</p> <p>7 <b>A In this case it would be Alfred Gerum.</b></p> <p>8 Q Do you recall -- you said it was based on</p> <p>9 the number of users for the customer. Do you</p> <p>10 recall what the steps are as they relate to the</p> <p>11 number of users? What's the -- you know, the</p> <p>12 lowest level?</p> <p>13 <b>A That's why I would like to consult and</b></p> <p>14 <b>come back.</b></p> <p>15 Q What's the annual maintenance fee amount</p> <p>16 for the e-Procurement application?</p> <p>17 <b>A For all M3 applications we have a</b></p> <p>18 <b>percentage of the license fee.</b></p> <p>19 Q What is the percentage of the license</p> <p>20 fee --</p> <p>21 <b>A Standard is 21 percent.</b></p> <p>22 Q Does Lawson provide any consulting</p>	<p>112</p> <p>1 <b>don't know what the numbers were for those</b></p> <p>2 <b>customers. I don't.</b></p> <p>3 Q What would you need to review in order to</p> <p>4 determine what the fees were associated with</p> <p>5 consulting services for that implementation?</p> <p>6 <b>A We would have -- the contract as such,</b></p> <p>7 <b>possibly.</b></p> <p>8 Q Where are the contracts relating to sales</p> <p>9 of M3 solutions retained?</p> <p>10 <b>A Centrally.</b></p> <p>11 Q Where is the central location where those</p> <p>12 are retained?</p> <p>13 <b>A Physically I would assume it's in Saint</b></p> <p>14 <b>Paul.</b></p> <p>15 Q Is there a particular database that you</p> <p>16 would refer to?</p> <p>17 <b>A No. There is not.</b></p> <p>18 Q If you needed to access a contract</p> <p>19 relating to the license of an M3 solution, where</p> <p>20 would you go to access that?</p> <p>21 <b>A I would talk to the account executive of</b></p> <p>22 <b>the account. And in many situations -- yes, I</b></p>

<p>113</p> <p>1 would talk to the account executive.</p> <p>2 Q To the right on this page, under the</p> <p>3 heading "Reference Customers," do you see that?</p> <p>4 A Yes.</p> <p>5 Q There are some companies that are listed</p> <p>6 there. The company Siemens, that company has U.S.</p> <p>7 locations, doesn't it?</p> <p>8 A The company Siemens might have. That</p> <p>9 seems a fair assumption. But our implementation of</p> <p>10 it has, to my knowledge, none.</p> <p>11 Q How can you determine that?</p> <p>12 A By the fact that it's not used in U.S.</p> <p>13 Q How do you know that no U.S.-based --</p> <p>14 A To my knowledge the contract with Siemens</p> <p>15 doesn't include any users in the United States. To</p> <p>16 my knowledge.</p> <p>17 Q And the company Autoliv, they have</p> <p>18 U.S. -- that company has U.S. locations, does it</p> <p>19 not?</p> <p>20 A Again, the company Autoliv has to my</p> <p>21 understanding locations or offices in the United</p> <p>22 States. Our solution has no users in the United</p>	<p>115</p> <p>1 deploy the e-Procurement application?</p> <p>2 A Again, I don't think I can advise on a</p> <p>3 typical time, depending on how few implementations</p> <p>4 we have made specifically in the United States.</p> <p>5 But I think it's -- yes.</p> <p>6 Q What was the time it took to implement</p> <p>7 the Siemens implementation?</p> <p>8 A That I cannot answer to. Fast deployment</p> <p>9 here is -- in general terms it's not months -- we</p> <p>10 don't talk about years. We talk about definitely</p> <p>11 much less than half a year to get it up and</p> <p>12 running. It's weeks and months rather than months</p> <p>13 and years. That's the general understanding and</p> <p>14 meaning of "fast deployment" here.</p> <p>15 MS. ALBERT: Let me have the reporter</p> <p>16 mark as Billgren Exhibit 8 a document entitled</p> <p>17 "Lawson M3 e-Procurement 13.1.1.3.0, Quick</p> <p>18 Installation Guide." It bears production numbers L</p> <p>19 0061318 through 351.</p> <p>20 (Billgren Exhibit 8 was marked for</p> <p>21 identification and attached to the deposition</p> <p>22 transcript.)</p>
<p>114</p> <p>1 States.</p> <p>2 Q How do you know that?</p> <p>3 A Again, through that -- they haven't</p> <p>4 created licenses for users to my knowledge outside</p> <p>5 of, in this case, Sweden.</p> <p>6 Q Underneath the heading "Prospect Size,"</p> <p>7 there's a subheading, "Customer Size," do you see</p> <p>8 that?</p> <p>9 A Yes.</p> <p>10 Q The third bullet under that heading</p> <p>11 reads, "Product is well-suited for fast deployment</p> <p>12 and phased rollout." What is meant by "phased</p> <p>13 rollout"?</p> <p>14 A You don't have to -- in this case the</p> <p>15 meaning implies that you don't have to include all</p> <p>16 buyers or requisitions at the same time, you don't</p> <p>17 have to include all products at the same time. You</p> <p>18 can take one part at a time. You don't have to</p> <p>19 sort of have a big bang approach when you implement</p> <p>20 it.</p> <p>21 Q And the reference to the fast deployment</p> <p>22 time, what's the typical time it would take to</p>	<p>116</p> <p>1 BY MS. ALBERT:</p> <p>2 Q Are you familiar with the document that's</p> <p>3 been marked as Billgren Exhibit 8?</p> <p>4 A Yes, I am.</p> <p>5 Q What is it?</p> <p>6 A It's a guide for a consultant, for a</p> <p>7 partner to understand how to install the</p> <p>8 e-Procurement solution. Technically,</p> <p>9 implementation guide. Or installation, I should</p> <p>10 say, that's the proper English word.</p> <p>11 Q The reference to 13.1.1.3.0, is that the</p> <p>12 reference to the current version of the</p> <p>13 e-Procurement application?</p> <p>14 A Yes, it is. This is the detailed</p> <p>15 versioning inside the M3 7.1 umbrella version.</p> <p>16 Q Do you know if 13.1.1.3.0 is the current</p> <p>17 version of the e-Procurement application?</p> <p>18 A 1.3, to my understanding, yes, it is.</p> <p>19 Q Is this a standard type of guide created</p> <p>20 by Lawson in the ordinary course of its business?</p> <p>21 A Yes.</p> <p>22 Q Who creates this guide?</p>

<p>117</p> <p>1 A It's a joint effort of Lawson in</p> <p>2 development, product management, and services and</p> <p>3 competences to make sure that we have an</p> <p>4 installation guide.</p> <p>5 Q And you said that this guide would be</p> <p>6 provided to a consultant or a partner. Would this</p> <p>7 also be provided to a customer in order for the</p> <p>8 customer to understand the instructions for how to</p> <p>9 install the M3 e-Procurement application?</p> <p>10 A Typically we like to sort of help</p> <p>11 customers in that and offer those services. Again,</p> <p>12 since we don't sell a lot of this, it's -- there</p> <p>13 are more exceptions than rules. If a customer</p> <p>14 should want to install it themselves, we would</p> <p>15 supply them with this document. But we would</p> <p>16 typically like to be engaged and involved in an</p> <p>17 implementation -- in an installation. In an</p> <p>18 installation.</p> <p>19 Q What are all of the different types of</p> <p>20 guides that are associated with the M3</p> <p>21 e-Procurement application?</p> <p>22 A That, you have to define.</p>	<p>119</p> <p>1 installed, and then after implementation, you</p> <p>2 shouldn't need any guide to use it. Then we've</p> <p>3 actually failed with implementation. It should be</p> <p>4 self-explanatory. You click on your product groups</p> <p>5 and you find your product, you click this is what I</p> <p>6 want, and then there should be enough instructions</p> <p>7 on the screen.</p> <p>8 Q Is there an administrator --</p> <p>9 A I don't think we have real user guides to</p> <p>10 e-Procurement, when I think about it.</p> <p>11 Q Do any customers ever ask that you</p> <p>12 provide training to them on how to use the product?</p> <p>13 A Again, we don't have that many customers.</p> <p>14 But we can always supply with training for all our</p> <p>15 products if customers asked, is asking us.</p> <p>16 Q Have you ever provided to a customer that</p> <p>17 has asked for training any type of materials such</p> <p>18 as a training written guide or a video instruction</p> <p>19 or a webinar?</p> <p>20 A As part of a bespoke or a customized</p> <p>21 offering to a customer, maybe. I wouldn't know,</p> <p>22 because I don't have all the details of all of our</p>
<p>118</p> <p>1 Q You have a quick installation guide, as</p> <p>2 marked as Exhibit 8. What are the other guides</p> <p>3 that are available for the e-Procurement</p> <p>4 application?</p> <p>5 A As a guide on how to execute a process,</p> <p>6 in this case installation, this is the only guide</p> <p>7 that I'm aware of that we have.</p> <p>8 Q Are there user guides for the</p> <p>9 e-Procurement application?</p> <p>10 A Yes. They are descriptive material or</p> <p>11 training material.</p> <p>12 Q What are some of those training materials</p> <p>13 called?</p> <p>14 A I am now thinking to see if I can figure</p> <p>15 out what I -- no, honestly I have to pass on that</p> <p>16 question, to double-check what we really have from</p> <p>17 a user guide perspective.</p> <p>18 Q I haven't seen any user guides. So I was</p> <p>19 just wondering what you would give to an actual</p> <p>20 user to tell them how to use the product.</p> <p>21 A Typically the product is a self-service</p> <p>22 product, so you should actually, when it's</p>	<p>120</p> <p>1 implementations in e-Procurement, what kind of</p> <p>2 material we might have helped ourselves and the</p> <p>3 customer with in such a training.</p> <p>4 Q Is there any kind of standardized</p> <p>5 training that's available to describe how to use</p> <p>6 the e-Procurement application?</p> <p>7 A I would like to, again, search my memory</p> <p>8 on it. But I -- the more I'm searching, I don't</p> <p>9 think so. I don't think we have a standardized off</p> <p>10 the shelf training on e-Procurement, since it is a</p> <p>11 product that we so rarely encounter sales in.</p> <p>12 Q How many sales have you had total,</p> <p>13 overall time, with respect to the e-Procurement</p> <p>14 application?</p> <p>15 A Again, to give a really detailed answer,</p> <p>16 I need to refresh my memory. But I would say it's</p> <p>17 no more than -- definitely less than a hundred.</p> <p>18 And if I need to gauge it in, it might probably be</p> <p>19 less than 50.</p> <p>20 Q So if you needed to conduct a search to</p> <p>21 determine whether you had ever prepared any</p> <p>22 training materials for any of those 50 customers,</p>

<p>121</p> <p>1 where would you go to look?</p> <p>2 <b>A I don't know if I can, because if you as</b></p> <p>3 <b>a customer ask for a specific consultant activity,</b></p> <p>4 <b>and as part of that you produce material that is</b></p> <p>5 <b>material for that customer, and we don't</b></p> <p>6 <b>necessarily keep track of that. That might be the</b></p> <p>7 <b>customer's -- I don't think we can -- I don't know</b></p> <p>8 <b>if we can actually gather that information.</b></p> <p>9 Q There would be no place within Lawson</p> <p>10 where past training materials of this type might be</p> <p>11 retained?</p> <p>12 <b>A I wouldn't phrase it like that, because</b></p> <p>13 <b>saying "training materials" means it's</b></p> <p>14 <b>standardized. As you said, I don't think we have</b></p> <p>15 <b>standardized off the shelf training material. It</b></p> <p>16 <b>might be things we have done bespoke for customers.</b></p> <p>17 <b>Hence it is actually owned by the customer in that</b></p> <p>18 <b>case.</b></p> <p>19 Q Well, if you wanted to find a copy of one</p> <p>20 of these customized or bespoke training materials</p> <p>21 that you had prepared, where would you go to look</p> <p>22 for that?</p>	<p>123</p> <p>1 how to set up roles, how to import the supplier</p> <p>2 catalog and publish that to the Meta Catalog in the</p> <p>3 Buy Center, that sort of thing.</p> <p>4 <b>A I don't think we have that systemized,</b></p> <p>5 <b>again, to the best of my knowledge now, searching</b></p> <p>6 <b>my memory, that we have any of that standardized</b></p> <p>7 <b>off the shelf for customers. So it would be a</b></p> <p>8 <b>matter of education, case by case. Apart from</b></p> <p>9 <b>what's already documented here, of course.</b></p> <p>10 Q Have you prepared any customized</p> <p>11 materials for customers of that nature?</p> <p>12 <b>A Have I or --</b></p> <p>13 Q Has your group prepared or the</p> <p>14 professional services organization prepared any</p> <p>15 training materials of that nature with the --</p> <p>16 describing the administrator functions for any</p> <p>17 customer?</p> <p>18 <b>A Again, the same answer as before. I</b></p> <p>19 <b>wouldn't really know. That would be up to each</b></p> <p>20 <b>and -- case by case on the customers, if that's</b></p> <p>21 <b>been prepared on behalf of the customer, which then</b></p> <p>22 <b>would be the customer's material and not ours.</b></p>
<p>122</p> <p>1 <b>A That would be sort of a relation between</b></p> <p>2 <b>us and the customer, if he wants to share that with</b></p> <p>3 <b>us or not. We might have done it on behalf of him.</b></p> <p>4 <b>And it might include internal processes and</b></p> <p>5 <b>internal guidelines on how they use the system</b></p> <p>6 <b>themselves. So it might not be something that is</b></p> <p>7 <b>for us to share with anybody.</b></p> <p>8 MS. ALBERT: I would renew my request for</p> <p>9 any type of customized training materials that have</p> <p>10 been prepared for customers of the e-Procurement</p> <p>11 application, and that those be provided to us, if</p> <p>12 there are any.</p> <p>13 MR. SCHULTZ: To the extent they exist,</p> <p>14 we'll look to see if they are available.</p> <p>15 BY MS. ALBERT:</p> <p>16 Q Now, getting back to more standardized</p> <p>17 types of guides, is there an administrator guide</p> <p>18 associated with the e-Procurement application?</p> <p>19 <b>A What do you mean by "administrator</b></p> <p>20 <b>guide"?</b></p> <p>21 Q A system administrator guide to tell the</p> <p>22 administrator of the system, you know, for example,</p>	<p>124</p> <p>1 Q Can you turn to page 8 of the quick</p> <p>2 installation guide that has the Bates number ending</p> <p>3 325.</p> <p>4 <b>A Yes.</b></p> <p>5 Q What's displayed on this page? Can you</p> <p>6 describe what it's showing?</p> <p>7 <b>A First, I'm not a technical installer. I</b></p> <p>8 <b>don't intend to install e-Procurement or being able</b></p> <p>9 <b>to install e-Procurement. So I'm not technically</b></p> <p>10 <b>savvy to do that.</b></p> <p>11 Q Are there any applications that are</p> <p>12 prerequisites that you need to install prior to</p> <p>13 installation of the M3 e-Procurement application?</p> <p>14 <b>A As I said, you of course have to have</b></p> <p>15 <b>your operation system, and you also have to have</b></p> <p>16 <b>the run time environment, WebSphere application</b></p> <p>17 <b>server. I would be stretching my competence. But</b></p> <p>18 <b>looking at this page, as you said, 1325, in the box</b></p> <p>19 <b>A, I would say, would be some prerequisites that</b></p> <p>20 <b>you need to have on your server.</b></p> <p>21 Q So you need to have for example Microsoft</p> <p>22 SQL server installed and Microsoft SQL XML 3.0?</p>

<p>125</p> <p>1 A To the best of my understanding, yes.</p> <p>2 But as I said, I'm not technically savvy enough to</p> <p>3 decide in what order any of these needs to come in.</p> <p>4 But on a high level, yes, you need to have</p> <p>5 Microsoft SQL server. You need to have the</p> <p>6 WebSphere application server installed. So then</p> <p>7 this is a flow chart on in what sequence, after you</p> <p>8 have A, which are the prerequisites, then you do 1,</p> <p>9 2, 3, 4, 5, 6, 7, 8, 9, 10.</p> <p>10 Q What is the -- do you see in block 3,</p> <p>11 there's a reference to an MEC extension for</p> <p>12 e-Commerce, do you know what that's referring to?</p> <p>13 A I believe so. That's the e-Collaborator.</p> <p>14 Again, if you wanted to connect with M3 or XML</p> <p>15 sheets, to obtain -- to be able to communicate with</p> <p>16 the APIs of the M3 Business Engine.</p> <p>17 Q Thank you.</p> <p>18 MS. ALBERT: Let me have the reporter</p> <p>19 mark as Billgren Exhibit 9 a document entitled</p> <p>20 "Lawson M3 e-Procurement 13.1.1.3.0 Installation</p> <p>21 and Setup Guide." It bears production numbers L</p> <p>22 0061746 through 819.</p>	<p>127</p> <p>1 enough to say if these set of instructions are</p> <p>2 enough for anybody to run with the solution, since</p> <p>3 it is a self-service solution.</p> <p>4 But it would be very, very close to being</p> <p>5 a complete installation slash implementation of the</p> <p>6 basic foundation for e-Procurement when finalizing</p> <p>7 this more complete installation guide, hence that</p> <p>8 you could probably allow a supplier to go in and</p> <p>9 start uploading and as soon as you've uploaded, the</p> <p>10 first two items or products, you could start doing</p> <p>11 self-requisitions.</p> <p>12 Q Do you know if this is the most current</p> <p>13 version of the e-Procurement installation and setup</p> <p>14 guide?</p> <p>15 A To my understanding, yes, it is. But</p> <p>16 again -- yes.</p> <p>17 Q Thank you.</p> <p>18 MS. ALBERT: Let me have the reporter</p> <p>19 mark as Billgren Exhibit 10 a document entitled</p> <p>20 "Lawson M3 e-Procurement 13.1.1.3.0, M3</p> <p>21 Integrators' Guide." It bears production numbers L</p> <p>22 0061352 through 535.</p>
<p>126</p> <p>1 (Billgren Exhibit 9 was marked for</p> <p>2 identification and attached to the deposition</p> <p>3 transcript.)</p> <p>4 BY MS. ALBERT:</p> <p>5 Q Are you familiar with the document that's</p> <p>6 been marked as Billgren Exhibit 9?</p> <p>7 A Yes, I am.</p> <p>8 Q What is it?</p> <p>9 A This is the full installation and setup</p> <p>10 guide for the same.</p> <p>11 Q What's the purpose for this guide?</p> <p>12 A Again, to enable consultants, either our</p> <p>13 own or partners', or potentially for a customer who</p> <p>14 wants to handle this himself or in parallel with</p> <p>15 us.</p> <p>16 Q What's the distinction between the quick</p> <p>17 installation guide and this particular guide?</p> <p>18 A The quick installation guide is for me a</p> <p>19 short version and more technically oriented than</p> <p>20 the installation and the setup guide. There are</p> <p>21 more instructions on how to set up the solution</p> <p>22 here. And as I said, I'm not technically savvy</p>	<p>128</p> <p>1 (Billgren Exhibit 10 was marked for</p> <p>2 identification and attached to the deposition</p> <p>3 transcript.)</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. ALBERT:</p> <p>6 Q What is the document that's been marked</p> <p>7 as Billgren Exhibit 10?</p> <p>8 A You're asking me?</p> <p>9 Q Yes.</p> <p>10 A This is a guide on how you -- if you</p> <p>11 would choose to integrate e-Procurement with M3</p> <p>12 using e-Collaborator to access our APIs. I just</p> <p>13 reused that phrase because that's how I explained</p> <p>14 what the e-Collaborator was.</p> <p>15 Q Right. Okay. Do you know who authored</p> <p>16 this guide?</p> <p>17 A This again is a collaborative work done</p> <p>18 by product management and development. And now we</p> <p>19 spend beyond e-Procurement, this is all in</p> <p>20 e-Collaborator, which is part of our technology</p> <p>21 foundation as well.</p> <p>22 Q To whom is this guide distributed?</p>

<p>129</p> <p>1       <b>A</b>   Again, to consultants, ours or partners',</p> <p>2       and in some very rare cases someone who -- on the</p> <p>3       customer's side who sort of wants to in parallel</p> <p>4       with us understand how to integrate the solution.</p> <p>5       Q   Is there a central repository of all of</p> <p>6       the M3 technical documentation such as the guides</p> <p>7       that we're seeing today?</p> <p>8       <b>A</b>   They're all -- no, not really. We --</p> <p>9       they are presented for training to our own -- this</p> <p>10      is internal material, and they bring it forward to</p> <p>11      the people when relevant to train them and make</p> <p>12      sure they understand our solutions.</p> <p>13      Q   Are these M3 e-Procurement guides</p> <p>14      available on the support.lawson.com website?</p> <p>15      <b>A</b>   There are many things. If all three of</p> <p>16      them are available there, is that the question?</p> <p>17      Q   Well, let's start with this one marked as</p> <p>18      Exhibit 10. Do you know if that one's available at</p> <p>19      the support.lawson.com website?</p> <p>20      <b>A</b>   Support?</p> <p>21      Q   Are you familiar with that website?</p> <p>22      <b>A</b>   Support...</p>	<p>131</p> <p>1       it's only the latest version that is installed. So</p> <p>2       this is the only version of the solution that you</p> <p>3       would acquire or use.</p> <p>4       So we don't sort of really update older</p> <p>5       versions. They are more or less replaced.</p> <p>6       Q   Is there any kind of archive of</p> <p>7       historical documentation associated with the M3</p> <p>8       solution?</p> <p>9       <b>A</b>   That again is a huge question, because if</p> <p>10      you're talking about e-Procurement, these</p> <p>11      installation guides I think are only updated on the</p> <p>12      latest version, since there is no point in having</p> <p>13      them backdated, since we are only installing the</p> <p>14      latest version.</p> <p>15      Q   The version of -- well, strike that. Do</p> <p>16      you know if there is any difference in</p> <p>17      functionality between the current version of the</p> <p>18      e-Procurement application and the immediately prior</p> <p>19      version of the e-Procurement application?</p> <p>20      <b>A</b>   There have been enhancements in</p> <p>21      functionalities. Not any major, since it is a very</p> <p>22      obscure part of the entire M3 offering. So it's</p>
<p>130</p> <p>1       Q   The support website for Lawson?</p> <p>2       <b>A</b>   I don't think this is part of that.</p> <p>3       Q   Do you know if the installation guides</p> <p>4       are available at the support website?</p> <p>5       <b>A</b>   I don't know.</p> <p>6       Q   How would you find out?</p> <p>7       <b>A</b>   I would have to check the support site.</p> <p>8       Q   Do you know if any searches were</p> <p>9       conducted for documentation relating to prior</p> <p>10      versions of the e-Procurement application?</p> <p>11      <b>A</b>   Any documentation prior to this?</p> <p>12      Q   Right.</p> <p>13      <b>A</b>   No, I think -- my understanding was that</p> <p>14      it would be provided in a later documentation.</p> <p>15      Q   What about prior versions, have those</p> <p>16      been provided?</p> <p>17      <b>A</b>   Not to my -- I mean, in the level that</p> <p>18      they exist, which I'm not sure they do, because</p> <p>19      this has been written over time and over years. We</p> <p>20      don't sort of -- when the latest versions is out,</p> <p>21      the older version is no longer distributed or</p> <p>22      maintained or -- it's never installed again, so</p>	<p>132</p> <p>1       not really an investment area of ours. So they are</p> <p>2       not huge mega steps. But of course we keep the</p> <p>3       quality up of the product.</p> <p>4       Q   Do you know, do you recall what the</p> <p>5       functionality was that was associated with the last</p> <p>6       enhancements that were made to the e-Procurement</p> <p>7       application?</p> <p>8       <b>A</b>   To my recollection, nothing major that I</p> <p>9       can point out on top of my head.</p> <p>10      Q   Can you turn to page 76 of the guide.</p> <p>11      And that has the Bates number ending 427.</p> <p>12      <b>A</b>   Yes.</p> <p>13      Q   It refers here to some fields on the</p> <p>14      supplier master, and under order method, there is a</p> <p>15      reference to e-mail. And also under supplier</p> <p>16      e-mail, there's a reference. Do you know if the</p> <p>17      system uses e-mail functionality to communicate</p> <p>18      with suppliers?</p> <p>19      <b>A</b>   Again, the system is a bit vague. But</p> <p>20      this is only in conjunction when you have M3</p> <p>21      involved.</p> <p>22      Q   Right.</p>



<p>133</p> <p>1 A And then you need to sort of have a check</p> <p>2 and balance between e-Procurement and M3. So you</p> <p>3 have to have the same values for the suppliers</p> <p>4 involved, so that you could sort of send the</p> <p>5 purchase order to the supplier, either from</p> <p>6 e-Procurement or from M3. If you work</p> <p>7 e-Procurement standalone, which I think is the most</p> <p>8 common way of doing it, then you set up e-mail or</p> <p>9 faxes, and the system can create that for you.</p> <p>10 Or of course you communicate with the</p> <p>11 supplier through the Supplier Self-Service center,</p> <p>12 so he just goes to the web page and just views it.</p> <p>13 This is just meant to secure that these are in this</p> <p>14 case four fields in the M3 supply master record</p> <p>15 that needs to be specifically paid attention to.</p> <p>16 Q But you could implement the e-Procurement</p> <p>17 application in a manner so that a purchase order</p> <p>18 would be transmitted by the application via e-mail</p> <p>19 rather than posting it in the Supply Center?</p> <p>20 A Yes. I mean, that's nothing very</p> <p>21 specific for Lawson. I mean, everybody can</p> <p>22 generate an e-mail. It's just -- a printout, an</p>	<p>135</p> <p>1 created in M3, in parallel, so that you could, if</p> <p>2 you want to, to handle goods receiving in M3 rather</p> <p>3 than in e-Procurement. And at the end of the day,</p> <p>4 the most important feature with integration at all</p> <p>5 is to be able to do this in voice matching, at the</p> <p>6 end of the day.</p> <p>7 Q Could you turn to the next page, please.</p> <p>8 A Yes.</p> <p>9 Q Under the heading "Purchase Order</p> <p>10 Confirmation," the first sentence reads, "When a</p> <p>11 purchase order is confirmed in Lawson M3</p> <p>12 e-Procurement, the confirmation information is</p> <p>13 transferred to M3 as a purchase order</p> <p>14 confirmation."</p> <p>15 So again, in the situation where you have</p> <p>16 integrated the M3 e-Procurement application with</p> <p>17 the M3 system, you have Purchase Order confirmation</p> <p>18 created in both the e-Procurement application as</p> <p>19 well as in the M3 back end; is that correct?</p> <p>20 A Yes.</p> <p>21 Q And what's the purpose for which it's</p> <p>22 created in the M3 back end?</p>
<p>134</p> <p>1 output format can always have a designated e-mail</p> <p>2 application, so it creates an attachment of a PDF</p> <p>3 or whatever format.</p> <p>4 Q Can you turn to page 111 in the document.</p> <p>5 A Page 111.</p> <p>6 Q Under the heading "Create Purchase</p> <p>7 Order," the text reads, "Purchase orders are</p> <p>8 created in M3 as a result of Lawson M3</p> <p>9 e-Procurement requisition approval. When a</p> <p>10 requisition is approved in Lawson M3 e-Procurement,</p> <p>11 it will trigger the creation of a purchase order in</p> <p>12 M3 by the generation of an MBM file. In cases when</p> <p>13 one requisition results in more than one purchase</p> <p>14 order, the split into purchase orders will be done</p> <p>15 by Lawson M3 e-Procurement."</p> <p>16 So in a situation where you've deployed</p> <p>17 the application as integrated to M3, are purchase</p> <p>18 orders created in the M3 system versus being</p> <p>19 created in the e-Procurement application?</p> <p>20 A They always exist in e-Procurement, and</p> <p>21 as we said earlier, they are then on the screens</p> <p>22 called supplier orders. This shadow order is</p>	<p>136</p> <p>1 A So that you can eventually have that</p> <p>2 information available when you do the invoice</p> <p>3 matching, since e-Procurement doesn't handle</p> <p>4 anything of supply payments.</p> <p>5 Q Underneath the heading "Item Number</p> <p>6 Mapping," the first two sentences read, "The items</p> <p>7 used in Lawson M3 e-Procurement are selected from</p> <p>8 the various catalogs that have been made available</p> <p>9 in the application. Typically not all items in</p> <p>10 Lawson M3 e-Procurement are defined as items in</p> <p>11 M3."</p> <p>12 Why is that the case, that not all items</p> <p>13 in M3 e-Procurement are defined as items in M3?</p> <p>14 A The entire underlying idea with</p> <p>15 e-Procurement is that you should not have to have</p> <p>16 the items in your normal standard ERP solutions.</p> <p>17 Because if you were to keep -- I mean, typically in</p> <p>18 your M3 ERP, you keep track of all your old items,</p> <p>19 the items that you produced, to see my finished</p> <p>20 goods, your raw material.</p> <p>21 If you were to sort of, how should I say,</p> <p>22 contaminate, maybe that's the wrong word, but if I</p>

<p>137</p> <p>1 were to mix that with sort of external furniture</p> <p>2 suppliers or everybody else's items, that wouldn't</p> <p>3 help the situation.</p> <p>4 Q So you want to keep --</p> <p>5 A And actually M3 as such cannot handle</p> <p>6 transactions that does not have an item defined in</p> <p>7 the M3 system, whereas these are items that you</p> <p>8 don't want to have defined.</p> <p>9 Q So you want to keep the catalog items for</p> <p>10 your indirect materials in the database in the</p> <p>11 e-Procurement application versus replicating them</p> <p>12 in the M3 Item Master?</p> <p>13 A Because I think it's not just about</p> <p>14 keeping them separated as such, it's that you don't</p> <p>15 maintain the items from the suppliers. The</p> <p>16 suppliers maintain them from the Supplier</p> <p>17 Self-Service. That's the entire idea. You</p> <p>18 maintain your own items, whereas this is a</p> <p>19 self-service requisition type system, so that sort</p> <p>20 of to help you just handle that kind of procurement</p> <p>21 that comes from indirect materials and</p> <p>22 requisitions, meaning that you don't want to</p>	<p>139</p> <p>1 MS. ALBERT: Let me have the reporter</p> <p>2 mark as Billgren Exhibit 11 a copy of a document</p> <p>3 entitled "Lawson M3 e-Procurement 13.1.1.3.0</p> <p>4 Deployment Guide." It bears production numbers L</p> <p>5 0061536 through 745.</p> <p>6 (Billgren Exhibit 11 was marked for</p> <p>7 identification and attached to the deposition</p> <p>8 transcript.)</p> <p>9 BY MS. ALBERT:</p> <p>10 Q Are you familiar with the document that's</p> <p>11 been marked as Billgren Exhibit 11?</p> <p>12 A Yes, I am familiar with the document.</p> <p>13 Q What is it?</p> <p>14 A This is a document that -- deployment, in</p> <p>15 this case that means sort of how do I continue from</p> <p>16 when I have done the other documents you presented</p> <p>17 to me, the -- let me say the right names -- I think</p> <p>18 it was 8, 9, and 10, how do you continue with</p> <p>19 making sure that the solution, the e-Procurement</p> <p>20 solution can be usable.</p> <p>21 Q So by whom is this guide used?</p> <p>22 A Again, it's geared to the same audience,</p>
<p>138</p> <p>1 maintain them. You want the suppliers. And this</p> <p>2 solution --</p> <p>3 Q So --</p> <p>4 A Yes.</p> <p>5 Q -- once you've loaded a supplier catalog</p> <p>6 into your database in the Buy Center, the supplier</p> <p>7 can continue to maintain its items by sending you</p> <p>8 updates, for example if the prices have changed to</p> <p>9 those items, they can send updates through the</p> <p>10 Supply Center; is that what you mean when you're</p> <p>11 saying that the supplier maintains the items?</p> <p>12 A I wouldn't say "send updates." But he</p> <p>13 will go in and he will view the catalogs or the</p> <p>14 list of products he has, and then he would -- he</p> <p>15 can change or update them. And when they are</p> <p>16 updated or approved, he has his own little approval</p> <p>17 process, now they are approved, now all of a sudden</p> <p>18 they are published, i.e. viewable by the buyer so</p> <p>19 he can do a REQ on them.</p> <p>20 Q Thank you. I think I'm done with that</p> <p>21 document.</p> <p>22 A Okay.</p>	<p>140</p> <p>1 consultants, ours or potential partners'. And in</p> <p>2 some cases it could be shared with a customer who</p> <p>3 wants to do the deployment all by themselves.</p> <p>4 Typically we would offer to do it in conjunction or</p> <p>5 in parallel with the customer.</p> <p>6 Q Can you turn to page 7 of the guide.</p> <p>7 A ??</p> <p>8 Q 7. It has the Bates number ending 542.</p> <p>9 A Yes.</p> <p>10 Q Do you see under item 6, that item reads,</p> <p>11 "Set up each supplier as described in setting up</p> <p>12 suppliers on page 107. For each supplier you will</p> <p>13 need to do the following. 1, set up one or more</p> <p>14 supplier companies. 2, create one or more users</p> <p>15 for each supplier. 3, define one or more</p> <p>16 agreements for each supplier. 4, establish one or</p> <p>17 more catalogs, each of which is configured with</p> <p>18 product groups, location availability, company</p> <p>19 availability, and an approval procedure. 5, test</p> <p>20 the solution by publishing products for one or more</p> <p>21 catalogs."</p> <p>22 So in order to deploy the e-Procurement</p>

<p>141</p> <p>1 solution, you need to have catalogs that are</p> <p>2 associated with a supplier; is that correct?</p> <p>3 A Yes. If you want to do requisitions from</p> <p>4 said supplier. I mean, this is a stepped approach,</p> <p>5 where you are picking one step, step 6, meaning</p> <p>6 that now we have reached the situation and you're</p> <p>7 set up, where you actually start defining the</p> <p>8 suppliers that you have a relationship with. And</p> <p>9 these are the five substeps that you go through to</p> <p>10 secure that e-Procurement reflects that</p> <p>11 relationship that you have with that supplier.</p> <p>12 Q What does it mean under step 4, location</p> <p>13 availability? Do you know what that means?</p> <p>14 A I think the understanding of company and</p> <p>15 location availability here is that it's -- the</p> <p>16 product -- because it has nothing to do with on</p> <p>17 hand quantities. It's, are you available to -- say</p> <p>18 that you are the user of e-Procurement, and maybe</p> <p>19 you have 50 sites in all 50 states. Are you, A,</p> <p>20 available to deliver this product to this site, are</p> <p>21 you available from this company to deliver this</p> <p>22 process from the supplier to that -- so that at the</p>	<p>143</p> <p>1 with the product catalogs, where is that data</p> <p>2 imported into?</p> <p>3 A Again, sorry, I don't think he sends</p> <p>4 anything. He has the spreadsheet. And of course</p> <p>5 he has to update the spreadsheet somehow. And then</p> <p>6 we supply guidelines or templates for how such</p> <p>7 spreadsheet could look. Then that spreadsheet sort</p> <p>8 of you upload to e-Procurement.</p> <p>9 Q Where --</p> <p>10 A You don't send anything.</p> <p>11 Q Okay. Thank you. Where are the</p> <p>12 guidelines -- you said that there were -- Lawson</p> <p>13 supplies guidelines or templates for how the</p> <p>14 spreadsheet could look. Where are those guidelines</p> <p>15 or templates?</p> <p>16 A You would find them in these documents.</p> <p>17 Q All right. Maybe we'll hit upon that as</p> <p>18 we go through this document.</p> <p>19 A But it is just really a spreadsheet.</p> <p>20 Q Does the template have formats for the</p> <p>21 fields of data that should be associated with each</p> <p>22 item?</p>
<p>142</p> <p>1 end of the day you don't have published or viewable</p> <p>2 products that cannot be delivered.</p> <p>3 Q Can you turn to page 21 of the guide.</p> <p>4 A 21. Yes.</p> <p>5 Q Under the heading "Customizing the Excel</p> <p>6 Spreadsheet," the first sentence reads, "Lawson M3</p> <p>7 e-Procurement can use a Microsoft Excel spreadsheet</p> <p>8 to exchange product catalogs with suppliers." The</p> <p>9 next sentence indicates that the spreadsheet is</p> <p>10 specially programmed to make it easy for suppliers</p> <p>11 to create and modify catalogs that can be imported</p> <p>12 into Lawson M3 e-Procurement via the Supply Center</p> <p>13 presentation.</p> <p>14 Can you explain this supplier catalog</p> <p>15 import process?</p> <p>16 A It's -- the process is really an upload</p> <p>17 of said spreadsheet into the database of</p> <p>18 e-Procurement, where the information on the</p> <p>19 spreadsheet is told in a way where it can then,</p> <p>20 when approved, be viewed by the buyer, the</p> <p>21 requisitioner.</p> <p>22 Q Once the supplier sends the spreadsheet</p>	<p>144</p> <p>1 A Yes. It helps and guides how you work</p> <p>2 with the spreadsheet.</p> <p>3 Q Do you remember some of the fields of</p> <p>4 data that are included in the template?</p> <p>5 A Your item number, your item description,</p> <p>6 the price of the item, any other text that you want</p> <p>7 to be displayed with the item, descriptions of</p> <p>8 various nature.</p> <p>9 Q The next sentence following that sentence</p> <p>10 reads, "The spreadsheet further includes a</p> <p>11 validation function to ensure that the supplier has</p> <p>12 filled in the fields correctly, or at least in a</p> <p>13 way that will allow the import function to work."</p> <p>14 Can you describe this validation function?</p> <p>15 A It's meant to sort of help the supplier</p> <p>16 so that if he has made errors, that they are</p> <p>17 detected before he actually tries to do the upload,</p> <p>18 so you haven't entered wrong things in the wrong</p> <p>19 fields.</p> <p>20 MS. ALBERT: The videographer has</p> <p>21 indicated that he needs some time to change the</p> <p>22 tape. So let's take a brief recess to allow the</p>

<p>1 videographer to change the tape.</p> <p>2 THE VIDEOGRAPHER: This marks the end of</p> <p>3 tape number 2 in the deposition of Mr. Billgren.</p> <p>4 We're going off the record. The time is 3:16 p.m.</p> <p>5 (Recess.)</p> <p>6 THE VIDEOGRAPHER: This marks the</p> <p>7 beginning of tape number 3 in the deposition of</p> <p>8 Mr. Billgren. We're back on the record. The time</p> <p>9 is 3:24 p.m.</p> <p>10 BY MS. ALBERT:</p> <p>11 Q Mr. Billgren, referring back to page 21</p> <p>12 of Exhibit 11, under the heading "Modifying the</p> <p>13 Database," do you see there's a reference to an EPR</p> <p>14 database?</p> <p>15 A Yes.</p> <p>16 Q What is the EPR database?</p> <p>17 A I don't recall or remember the</p> <p>18 abbreviation, what it stands for.</p> <p>19 Q Is it the database where the supplier</p> <p>20 catalog data is stored?</p> <p>21 A Give me a second here. I think EPR</p> <p>22 stands for the e-Procurement database.</p>	<p>145</p> <p>1 a product if you as a supplier would like to have a</p> <p>2 new field to your information of the product. Did</p> <p>3 that make sense?</p> <p>4 Q So are tables associated with the</p> <p>5 supplier item data stored in the e-Procurement</p> <p>6 database?</p> <p>7 A Yes.</p> <p>8 Q What data is stored in the table Product</p> <p>9 Supply?</p> <p>10 A Then I would have to go to the table</p> <p>11 definition for that, which I don't know by heart.</p> <p>12 Q Do you know what data is stored in the</p> <p>13 Product Buy table?</p> <p>14 A The same answer to Product Supply. But</p> <p>15 the Product Supply and Buy data is typically a</p> <p>16 reflection of each other. But the data content,</p> <p>17 you have to go to the table definition.</p> <p>18 Q Can you go to page 22 of the guide.</p> <p>19 A Yes.</p> <p>20 Q Do you see at the top of the page,</p> <p>21 there's a reference to a procedure, Catalog</p> <p>22 Publish. Does this Catalog Publish procedure come</p>
<p>146</p> <p>1 Q And what types of data are stored in the</p> <p>2 e-Procurement database?</p> <p>3 A Again, the definition of "database" here</p> <p>4 means that it's sort of a database which could have</p> <p>5 several tables. So what it says, the instruction</p> <p>6 says, tells me, my understanding of it, is you open</p> <p>7 up the e-Procurement database, and you add a new</p> <p>8 field to the database, in this case weight, because</p> <p>9 you want to populate a new content in the product</p> <p>10 supply table.</p> <p>11 So you have a field called "Weight" that</p> <p>12 you want to be added to the e-Procurement database</p> <p>13 as such, because it's not there. This is an</p> <p>14 example of a field that you want to add. And then</p> <p>15 you add the field as such, as a field definition,</p> <p>16 and then you tell the SQL server in the</p> <p>17 e-Procurement database that that field applies to</p> <p>18 the table Product Supply, Product Buy, Product Work</p> <p>19 Area, Product Upload.</p> <p>20 And then you just continue the procedure.</p> <p>21 And thereby you have the -- so this directs you to</p> <p>22 the tables that needs to contain the new field for</p>	<p>148</p> <p>1 with the e-Procurement application as it's</p> <p>2 delivered?</p> <p>3 A This is a stored procedure that only does</p> <p>4 one thing. It takes the information in the Product</p> <p>5 Supply table and copies it to the Product Buy</p> <p>6 table. The Product Buy is the approved catalog.</p> <p>7 So that is what the buyer sees when he or she is</p> <p>8 doing a requisition.</p> <p>9 Q And there's a procedure reference down</p> <p>10 below that process, Catalog Upload.</p> <p>11 A Yes.</p> <p>12 Q Does that procedure come with the</p> <p>13 e-Procurement application as delivered?</p> <p>14 A Yes, the same as Catalog Publish. And</p> <p>15 the reason why they are mentioned here on page 22</p> <p>16 is that they are made mention in the context of</p> <p>17 modifying the database. So if you want to add a</p> <p>18 field, then you have to -- to the product, you have</p> <p>19 to impact these tables, Supply, Buy, and Work Area,</p> <p>20 and Product Upload. Then you also have to change</p> <p>21 in the store procedures, that copies from Product</p> <p>22 Supply, that's used for Update and the Work Area.</p>

<p>149</p> <p>1 Q Can you turn to page 37 of the guide.</p> <p>2 A 37. Yes.</p> <p>3 Q Under the heading "Establishing Product</p> <p>4 Groups," the first sentence reads that "All</p> <p>5 products in all catalogs must be associated with a</p> <p>6 product group." What is a product group?</p> <p>7 A A product group is the sorting identity</p> <p>8 to which all products are connected, so that the</p> <p>9 buyer can view the products by product group.</p> <p>10 Q Why is it necessary that all products in</p> <p>11 all catalogs be associated with a product group?</p> <p>12 A It's just the way the system is built.</p> <p>13 Otherwise they're not displayed.</p> <p>14 Q So you used the product group in order to</p> <p>15 search for products that you wished to requisition?</p> <p>16 A Yes. That's the hierarchal -- also the</p> <p>17 hierarchal way the products are displayed for all</p> <p>18 vendors or suppliers.</p> <p>19 Q So as it indicates down in the next</p> <p>20 paragraph, product groups are organized into a tree</p> <p>21 structure, with the top level groups representing</p> <p>22 the most general groups, each of which can be</p>	<p>151</p> <p>1 Q Can you -- when you define a particular</p> <p>2 role for a user of the e-Procurement application,</p> <p>3 can you use that, in the role definition, can you</p> <p>4 limit the supplier product catalogs that that user</p> <p>5 can be provided access to?</p> <p>6 A Yes. You can.</p> <p>7 Q Can you turn to page 101 in the guide.</p> <p>8 A Okay.</p> <p>9 Q At the top of the page there's a bullet</p> <p>10 referencing "Product Offer Dot Update Expired</p> <p>11 Offers." And the description under that bullet</p> <p>12 reads, "Checks product offers for expiry," I don't</p> <p>13 know how to pronounce that word, "according to</p> <p>14 dates set in the Supply Center, and changes the</p> <p>15 status accordingly in the e-Procurement database."</p> <p>16 A Mm-hmm.</p> <p>17 Q Does this job -- is this provided</p> <p>18 standard in the e-Procurement application?</p> <p>19 A Yes.</p> <p>20 Q What information is in the Supply Center</p> <p>21 that is checked to determine if the product offer</p> <p>22 is still available or has expired?</p>
<p>150</p> <p>1 broken down further into smaller subgroups.</p> <p>2 A Yes.</p> <p>3 Q So you can use that product group search</p> <p>4 functionality to drill down the tree structure from</p> <p>5 general product groups to increasingly more</p> <p>6 specific product groups when you're conducting a</p> <p>7 search for a particular item; is that correct?</p> <p>8 A Yes.</p> <p>9 Q Does the e-Procurement application come</p> <p>10 with any predefined product group hierarchy tree?</p> <p>11 A No.</p> <p>12 Q Does the user have to define the product</p> <p>13 group hierarchy when they set up the system?</p> <p>14 A Yes.</p> <p>15 Q Can you turn to page 85 of the guide,</p> <p>16 please.</p> <p>17 A 85. Yes.</p> <p>18 Q This page relates to user roles. Can</p> <p>19 user roles be used to define which supplier product</p> <p>20 catalogs a specific user is provided access to?</p> <p>21 A Sorry. I have to take that question</p> <p>22 again.</p>	<p>152</p> <p>1 A Expire date. And today's date.</p> <p>2 Q So is one of the fields associated with a</p> <p>3 catalog item expiration date?</p> <p>4 A Yes, or expiry date or whatever, a date</p> <p>5 when that product or that specific line in the</p> <p>6 catalog is no longer valid.</p> <p>7 Q Can you turn to page 104.</p> <p>8 A 104. Yes.</p> <p>9 Q Under the heading "Submitting Orders to</p> <p>10 Suppliers," the first paragraph reads, "When an</p> <p>11 order has been completely approved, Lawson M3</p> <p>12 e-Procurement formats the order using a Word</p> <p>13 template and saves each order as a PDF or Word</p> <p>14 document based on this template. It is then ready</p> <p>15 to be submitted to the appropriate suppliers.</p> <p>16 Submission is done via e-mail."</p> <p>17 So you had indicated earlier that you</p> <p>18 could post the supply order in the Supply Center.</p> <p>19 Can you either -- can you do either posting it in</p> <p>20 the Supply Center or sending it via e-mail with the</p> <p>21 e-Procurement application?</p> <p>22 A Both. It's both. I mean, it's always</p>

<p>153</p> <p>1 posted in the Supply Center, if the supplier should</p> <p>2 look for it.</p> <p>3 Q And then if the supplier prefers to</p> <p>4 receive it via e-mail, the e-Procurement</p> <p>5 application includes the functionality to save the</p> <p>6 order as a PDF or Word document?</p> <p>7 A Yes.</p> <p>8 Q And includes the functionality to</p> <p>9 transmit that via e-mail; is that correct?</p> <p>10 A Yes. Yes. That's what I said. So you</p> <p>11 don't need to create the purchase order in the M3</p> <p>12 Business Engine, as we have said earlier, to get</p> <p>13 the process flow operating.</p> <p>14 Q Can you turn to page 116.</p> <p>15 A Mm-hmm.</p> <p>16 Q Towards the bottom of the page, there's a</p> <p>17 bullet reading "valid from" and "valid to." Do you</p> <p>18 see that?</p> <p>19 A Mm-hmm.</p> <p>20 Q And the description next to that bullet</p> <p>21 reads, "Use these settings to control the date</p> <p>22 span, using DD/MM/YYYY format, in which the</p>	<p>155</p> <p>1 A In this context, it is the way to</p> <p>2 import -- so that the supplier, as we said earlier,</p> <p>3 you can take a spreadsheet, Excel spreadsheet,</p> <p>4 upload that. Instead, you can have an XML</p> <p>5 document, and then you have to use the XML Gateway</p> <p>6 to upload. And then you have to use our</p> <p>7 e-Procurement XML formats for that.</p> <p>8 Q And the e-Procurement XML format, where</p> <p>9 can that be found?</p> <p>10 A How do you mean, where can that be found?</p> <p>11 Q Is there a standard format that you</p> <p>12 provide in order to define the format for the data</p> <p>13 that the supplier is going to provide via the XML</p> <p>14 method of transmission of its catalogs?</p> <p>15 A Yes. I mean, the document will be</p> <p>16 defined somewhere.</p> <p>17 Q Do you know where that document is</p> <p>18 defined?</p> <p>19 A On top of my head I can't say where in</p> <p>20 these documents, no. I have to search for it. But</p> <p>21 it also states that this is not the only way you</p> <p>22 can do it. You can upload it through any kind of</p>
<p>154</p> <p>1 catalogs under this agreement will be visible on</p> <p>2 the Buy Center. They will be invisible on all days</p> <p>3 outside of this range."</p> <p>4 So if a catalog is no longer visible to</p> <p>5 buyers through the Buy Center, does that mean that</p> <p>6 the company's agreement with the supplier may have</p> <p>7 expired or that those products, those supplier</p> <p>8 products are no longer available for purchase?</p> <p>9 A It could mean any of those, and</p> <p>10 whatever -- it simply says that you have here a</p> <p>11 capability or a facility, a feature to -- or a</p> <p>12 facility to, in each and every of the lines, tell</p> <p>13 about the validity, whatever reason. But it's</p> <p>14 manually entered.</p> <p>15 Q Can you turn to page 120 of the guide.</p> <p>16 A Yes.</p> <p>17 Q Underneath the heading "Product Entry and</p> <p>18 Upload," there's a bullet, the third bullet down,</p> <p>19 that states, "Uploading changes to the XML</p> <p>20 Gateway," do you see that?</p> <p>21 A Yes.</p> <p>22 Q What is the XML Gateway?</p>	<p>156</p> <p>1 special portal, which you have to develop yourself</p> <p>2 and use, whatever style sheet you have. But it</p> <p>3 needs to get into the e-Procurement XML format.</p> <p>4 You know, it's a mapping --</p> <p>5 e-Collaborator is a mapping tool. So whatever XML</p> <p>6 shape, format you might have, you can map it in</p> <p>7 e-Procurement so that the transformation is done.</p> <p>8 Q Would the formats be found in the</p> <p>9 e-Collaborator guide?</p> <p>10 A I would have -- either there or in the</p> <p>11 integrators' guide.</p> <p>12 Q I didn't see any file formats in the</p> <p>13 integrators' guide, but maybe I need to look again.</p> <p>14 A But as to say, I -- I would have thought</p> <p>15 it in this -- there might be a link to where it is</p> <p>16 in this.</p> <p>17 MS. ALBERT: If there are particular</p> <p>18 documents defining the standard templates for the</p> <p>19 XML spreadsheet for the catalog upload or the XML</p> <p>20 format used for the catalog data upload, I would</p> <p>21 ask that those be produced. I've looked in the</p> <p>22 documentation, and I cannot find those templates.</p>

<p>157</p> <p>1 MR. SCHULTZ: We'll check to see if they</p> <p>2 exist.</p> <p>3 MS. ALBERT: Thank you.</p> <p>4 BY MS. ALBERT:</p> <p>5 Q Can you turn to page 154 of the guide,</p> <p>6 please. This page describes some e-mail messaging</p> <p>7 that's generated by the e-Procurement application;</p> <p>8 is that correct?</p> <p>9 A One second. I managed to do something</p> <p>10 with my microphone. Sorry. Yes, you were saying?</p> <p>11 Q This page describes some e-mail messaging</p> <p>12 that's generated by the e-Procurement application,</p> <p>13 is that correct?</p> <p>14 A Yes. It is.</p> <p>15 Q And this particular e-mail message is</p> <p>16 entitled "Order Confirmed." What is the purpose</p> <p>17 for an "Order Confirmed" e-mail message?</p> <p>18 A This e-mail is meant to be used and</p> <p>19 generated by a store procedure when the supplier</p> <p>20 using the Supply Center -- you remember I said they</p> <p>21 can view these, and of course they can have them in</p> <p>22 mail or in parallel, but to send a signal to the</p>	<p>159</p> <p>1 know that that exists. I was just trying to see --</p> <p>2 yes, here it is. Could you repeat the question</p> <p>3 again? I'm not sure I'm answering your question.</p> <p>4 Q Is the e-mail notification found on page</p> <p>5 160 of the guide, the type of e-mail message that a</p> <p>6 supplier could use to tell a buyer that it was</p> <p>7 rejecting one line of the order and confirming</p> <p>8 another part of an order?</p> <p>9 A I would say yes, with a caveat that he</p> <p>10 doesn't generate -- the supplier doesn't do</p> <p>11 anything. He put in a comment, and when this store</p> <p>12 procedure would then generate the e-mail, when he</p> <p>13 has singled out rather that -- so that the first</p> <p>14 e-mail you talked about to me about on page</p> <p>15 whatever it was --</p> <p>16 Q 154.</p> <p>17 A Was it 154? Was there for the entire --</p> <p>18 has been confirmed, this has come back as a comment</p> <p>19 if he has made that line reservation.</p> <p>20 Q Thank you.</p> <p>21 A That's why there are so many messages.</p> <p>22 But the purpose here is that the collaboration --</p>
<p>158</p> <p>1 buyer that I have now received the order, so I can</p> <p>2 expect it to arrive.</p> <p>3 So the e-mail -- the purpose of the</p> <p>4 e-mail is to inform the buyer that the order has</p> <p>5 been not just approved, because it was already</p> <p>6 approved, but is now confirmed by the supplier.</p> <p>7 Q Can a supplier reject part of an order</p> <p>8 and confirm part of an order, like reject one line</p> <p>9 on an order and confirm one line of the order?</p> <p>10 A To my understanding, yes, they can -- you</p> <p>11 can set it up so that they can do that, yes.</p> <p>12 Q Would this type of e-mail be used to make</p> <p>13 that notification to a buyer?</p> <p>14 A No, I think the process is much more</p> <p>15 simpler than that, to my understanding, because I</p> <p>16 think that...</p> <p>17 Q How can a supplier --</p> <p>18 A I -- my understanding is that typically</p> <p>19 you -- if you were to sort of -- because there is a</p> <p>20 special message sent when you have reacted the</p> <p>21 order, if the supplier says I can cannot do it,</p> <p>22 then there is a special message for that. And I</p>	<p>160</p> <p>1 yes.</p> <p>2 Q Can you turn to page 199 of the guide.</p> <p>3 A 199. I'm sorry. Oh. Yes.</p> <p>4 Q The heading on that page is "What is the</p> <p>5 XML Gateway?"</p> <p>6 A Mm-hmm.</p> <p>7 Q Do you see that? This XML Gateway I</p> <p>8 think we talked about before as enabling the web</p> <p>9 applications to communicate with the other systems,</p> <p>10 the -- well, can you just describe for me what the</p> <p>11 functionality of the XML Gateway is?</p> <p>12 A Yes. I mean, other than what the text</p> <p>13 says here, you mean, or -- do you have a</p> <p>14 question --</p> <p>15 Q At a high level, how is the XML Gateway</p> <p>16 used in connection with the e-Procurement</p> <p>17 application?</p> <p>18 A It's used in what is called the Design</p> <p>19 Center, when you set up your solution. And it has</p> <p>20 three prime functions, as it describes here; either</p> <p>21 to talk to the e-Collaborator, or to act as an</p> <p>22 extension for e-Collaborator so you can use XML</p>

<p>161</p> <p>1 communication in your web applications, and also to</p> <p>2 just do any collaborative or any communication from</p> <p>3 one business object to another.</p> <p>4 So it's programmatically something that</p> <p>5 can be used to achieve exchange or development in</p> <p>6 the system.</p> <p>7 Q Would you need to have the XML Gateway</p> <p>8 implemented in order to have the functionality</p> <p>9 associated with a supplier using the XML template</p> <p>10 to send the supplier catalog data in that method</p> <p>11 rather than the Excel spreadsheet?</p> <p>12 A That's my understanding, yes.</p> <p>13 Q On this page 199, there's a reference to</p> <p>14 the Lawson product download page. Do you see that?</p> <p>15 A On page what?</p> <p>16 Q 199.</p> <p>17 A Yes.</p> <p>18 Q It says you can obtain MEC from the</p> <p>19 Lawson product download page. Where is the Lawson</p> <p>20 product download page found?</p> <p>21 A You remember I talked about we have -- I</p> <p>22 think I believe I used the word "office," or that</p>	<p>163</p> <p>1 MS. ALBERT: Can I take a brief couple of</p> <p>2 minute break?</p> <p>3 MR. SCHULTZ: Yes.</p> <p>4 THE VIDEOGRAPHER: We're going off the</p> <p>5 record. The time is 3:58 p.m.</p> <p>6 (Recess.)</p> <p>7 THE VIDEOGRAPHER: We're now back on the</p> <p>8 record. The time is 4:16 p.m.</p> <p>9 MS. ALBERT: I've had the reporter mark</p> <p>10 as Billgren Exhibit 12 a document entitled "Design</p> <p>11 Center 5.5 Users Guide." It bears production</p> <p>12 numbers LE 00372386 through 736.</p> <p>13 BY MS. ALBERT:</p> <p>14 Q Are you familiar with the document that's</p> <p>15 been marked as Billgren Exhibit 12?</p> <p>16 A Yes, I am.</p> <p>17 Q And what is this document?</p> <p>18 A It is a users guide for a specific portal</p> <p>19 called the Design Center, when you modify or tailor</p> <p>20 the e-Procurement solution.</p> <p>21 Q Who authored this guide?</p> <p>22 A Again, this is a collaborative effort</p>
<p>162</p> <p>1 distributes our software. And one way of</p> <p>2 distribution of software is download. So within</p> <p>3 the framework of our distribution office there is a</p> <p>4 web page for download for a customer who has a</p> <p>5 license, if they -- so they are given that address</p> <p>6 to go and download.</p> <p>7 If they have acquired a license, when we</p> <p>8 distribute -- and the distribution is through</p> <p>9 download, then they will be directed to that web</p> <p>10 page.</p> <p>11 Q Would a customer that's licensed the</p> <p>12 e-Procurement application be required to pay an</p> <p>13 additional license fee in order to obtain the M3</p> <p>14 Enterprise Collaborator?</p> <p>15 A The short answer is yes. E-Collaborator</p> <p>16 has its own price.</p> <p>17 Q And do you know what the fees are</p> <p>18 associated with a license to the e-Collaborator?</p> <p>19 A Not on top of my head.</p> <p>20 Q How would you find out that information?</p> <p>21 A Like I said before, I would just talk to</p> <p>22 my -- the product manager.</p>	<p>164</p> <p>1 with development and product management, and</p> <p>2 eventually then produced by our marketing team.</p> <p>3 Q To whom is this guide distributed?</p> <p>4 A This is for use of our consultants, our</p> <p>5 own, as well as to partners, to learn and</p> <p>6 understand how to use the Design Center for</p> <p>7 modifications, programmatic modifications or</p> <p>8 enhancements of the e-Procurement.</p> <p>9 Q Can you turn to page 238 of the guide.</p> <p>10 A 238.</p> <p>11 Q Yes.</p> <p>12 A Yes.</p> <p>13 Q There is a reference on that page to the</p> <p>14 Schema Retriever. Do you see that?</p> <p>15 A Yes.</p> <p>16 Q What is the functionality of the Schema</p> <p>17 Retriever?</p> <p>18 A Not being technology savvy enough to be</p> <p>19 able to use the Design Center myself, my</p> <p>20 understanding of the Schema Retriever is just an</p> <p>21 enabler of how to present the layout, the content</p> <p>22 of any data source that you want to use when you</p>



<p>165</p> <p>1 work in the Design Center.</p> <p>2 Q From where are the schema retrieved?</p> <p>3 A From my understanding, the schema is --</p> <p>4 the name of the schema is -- it retrieves the</p> <p>5 schema of the database, the file.</p> <p>6 Q So is there somewhere a definition of the</p> <p>7 schema associated with the catalog database of the</p> <p>8 Buy Center?</p> <p>9 A You would have to -- I mean, the Schema</p> <p>10 Retriever would retrieve any schema that you</p> <p>11 pointed to, my understanding.</p> <p>12 Q Do you know what the name of the schema</p> <p>13 is that's associated with the --</p> <p>14 A There are various references to where to</p> <p>15 go when you want to -- but you need to know what</p> <p>16 database to point at when you want to retrieve the</p> <p>17 schema. That's my understanding. You recall maybe</p> <p>18 earlier we talked about we had a database table</p> <p>19 for -- that was updated with the information from</p> <p>20 when this supplier uploaded information from a</p> <p>21 spreadsheet or through an XML schema. You would</p> <p>22 need to know what that database table is named and</p>	<p>167</p> <p>1 identification and attached to the deposition</p> <p>2 transcript.)</p> <p>3 BY MS. ALBERT:</p> <p>4 Q Mr. Billgren, what is the purpose of the</p> <p>5 Design Center component reference?</p> <p>6 A It is a consolidated document with the</p> <p>7 ambition to describe all the components that exist</p> <p>8 in our three applications, e-Procurement, e-Sales</p> <p>9 and Design Center.</p> <p>10 Q Do you know if this is the most recent</p> <p>11 version of the component reference?</p> <p>12 A To my understanding, yes, it is.</p> <p>13 Q Is this particular guide intended for the</p> <p>14 same types of audience that you've been describing</p> <p>15 with respect to the other e-Procurement guides?</p> <p>16 A Yes. Yes, it is.</p> <p>17 Q So it would be used by Lawson consultants</p> <p>18 or third party consultants who are deploying the</p> <p>19 e-Procurement application?</p> <p>20 A Yes. But with the possible caveat that</p> <p>21 this is geared towards the technical consultants,</p> <p>22 because these are components that you use when you</p>
<p>166</p> <p>1 then point this Schema Retriever towards it, and</p> <p>2 then it would publish the context of that.</p> <p>3 That's my understanding of what the</p> <p>4 Schema Retriever does, so that when you're in the</p> <p>5 middle of doing something, you can see what fields</p> <p>6 to use.</p> <p>7 Q Turning back to the cover page of the</p> <p>8 guide.</p> <p>9 A Cover page. Yes.</p> <p>10 Q There's a reference to a 5.5. Do you see</p> <p>11 that?</p> <p>12 A Yes.</p> <p>13 Q Do you know if this is the most recent</p> <p>14 version of the Design Center users guide?</p> <p>15 A My understanding, yes. Yes.</p> <p>16 Q Thank you. I think I'm done with that</p> <p>17 document.</p> <p>18 MS. ALBERT: Let me have the reporter</p> <p>19 mark as Billgren Exhibit 13 a document entitled</p> <p>20 "Design Center 5.5 Component Reference." It bears</p> <p>21 production numbers LE 00372146 through 345.</p> <p>22 (Billgren Exhibit 13 was marked for</p>	<p>168</p> <p>1 produce enhancements or changes to the system,</p> <p>2 typically.</p> <p>3 Q Thank you. I don't have any further</p> <p>4 questions on that document.</p> <p>5 MS. ALBERT: Let me have the reporter</p> <p>6 mark as Billgren Exhibit 14 a presentation entitled</p> <p>7 "Input to Supplier Portal." It bears production</p> <p>8 numbers LE 00297230 through 258.</p> <p>9 (Billgren Exhibit 14 was marked for</p> <p>10 identification and attached to the deposition</p> <p>11 transcript.)</p> <p>12 BY MS. ALBERT:</p> <p>13 Q Are you familiar with the document that's</p> <p>14 been marked as Billgren Exhibit 14?</p> <p>15 A No, I'm not.</p> <p>16 Q Do you know who Mr. Dagfinn Johnsen is?</p> <p>17 A Yes.</p> <p>18 Q Who is he?</p> <p>19 A A solution consultant that works for</p> <p>20 Lawson, out of Norway.</p> <p>21 Q Is he responsible for a particular</p> <p>22 solution?</p>

<p>169</p> <p>1       <b>A</b> I would say no. He is pr?cis, so he is</p> <p>2       <b>part of the solution design team, as we call them.</b></p> <p>3       <b>They help sales in designing a solution to present</b></p> <p>4       <b>to our customer -- prospective customer.</b></p> <p>5       Q Is Mr. Johnsen still employed by Lawson?</p> <p>6       <b>A</b> To my understanding he is no longer</p> <p>7       <b>employed by Lawson.</b></p> <p>8       Q Do you know when he ceased his employment</p> <p>9       with Lawson?</p> <p>10      <b>A</b> I would not have those datas.</p> <p>11      Q Do you know if it was in the last year?</p> <p>12      <b>A</b> I would not have those datas.</p> <p>13      Q Do you know where he is currently</p> <p>14      located?</p> <p>15      <b>A</b> No, I would not know that.</p> <p>16      Q Do you know by whom he's currently</p> <p>17      employed?</p> <p>18      <b>A</b> Not on the top of my head. No.</p> <p>19      Q What's the Supplier Portal?</p> <p>20      <b>A</b> In this context of this document?</p> <p>21      Q Yes, in the context of this document.</p> <p>22      <b>A</b> I don't know, since I don't know the</p>	<p>171</p> <p>1       <b>A</b> Yes.</p> <p>2       Q Do you see here the beginning of another</p> <p>3       presentation entitled "Product Information</p> <p>4       Management"? Have you ever seen this Product</p> <p>5       Information Management presentation before?</p> <p>6       <b>A</b> No, I have not seen this presentation by</p> <p>7       Dagfinn before.</p> <p>8       Q Do you know what the reference to Product</p> <p>9       Information Management, do you know what that term</p> <p>10      refers to?</p> <p>11      <b>A</b> In this context, no.</p> <p>12      Q Have you ever heard that term used within</p> <p>13      Lawson?</p> <p>14      <b>A</b> Yes.</p> <p>15      Q And how is the term used when you had</p> <p>16      heard it at Lawson?</p> <p>17      <b>A</b> We have partners that provides full</p> <p>18      solution for Product Information Management,</p> <p>19      partners like Inriver and UDK, Ume? Datakonsulter.</p> <p>20      And they provide catalog, read catalog management</p> <p>21      for customers to maintain their products in a</p> <p>22      product catalog. And that is one element of a</p>
<p>170</p> <p>1       document.</p> <p>2       Q Have you ever heard of something in</p> <p>3       Lawson called the Supplier Portal?</p> <p>4       <b>A</b> Yes.</p> <p>5       Q And what was the context in which you</p> <p>6       heard that term used?</p> <p>7       <b>A</b> It's an ongoing development that we have</p> <p>8       in a totally different aspect for one of our</p> <p>9       industry solutions, fashion.</p> <p>10      Q What's the functionality associated with</p> <p>11      the Supplier Portal that's under development?</p> <p>12      <b>A</b> That is a portal for suppliers in the</p> <p>13      fashion industry to collaborate information on</p> <p>14      direct material. So that we talked earlier on</p> <p>15      indirect material, but this is for direct material,</p> <p>16      so that -- and it's meant for the offshoring in the</p> <p>17      fashion industry. So you have manufacturing in</p> <p>18      very many different locations around the world, and</p> <p>19      you collaborate with the suppliers to create a</p> <p>20      supply order.</p> <p>21      Q Can you turn to the page in Exhibit 14</p> <p>22      with the Bates number ending 232.</p>	<p>172</p> <p>1       Product Information Management solution. So we</p> <p>2       have product partnerships for PIM, Product</p> <p>3       Information Management. But I don't know this</p> <p>4       context.</p> <p>5       Q In the context in which you're familiar</p> <p>6       with Product Information Management, is that type</p> <p>7       of service available to customers of the</p> <p>8       e-Procurement application?</p> <p>9       <b>A</b> Not particularly.</p> <p>10      Q For what applications is that service</p> <p>11      made available?</p> <p>12      <b>A</b> That's typically for -- again, one of</p> <p>13      these are specialized for fashion. So it's</p> <p>14      typically for maintaining your photos and text for</p> <p>15      your products that you want to get into your</p> <p>16      catalogs. But it's also connected to something</p> <p>17      which is called product life cycle management.</p> <p>18      Q Can you turn to the page of the</p> <p>19      presentation with the Bates number ending 233.</p> <p>20      <b>A</b> Still on this?</p> <p>21      Q Yes. And do you see at the bottom of the</p> <p>22      page the reference to the M3 database?</p>

<p>173</p> <p>1       <b>A Yes.</b></p> <p>2       Q Do you know what is being represented by</p> <p>3 the import process shown on that diagram?</p> <p>4       <b>A No, since I don't know of this</b></p> <p>5 <b>presentation.</b></p> <p>6       Q Do you know who within Lawson may have</p> <p>7 some responsibilities relating to the Product</p> <p>8 Information Management services?</p> <p>9       <b>A I -- yes. But not in this context of</b></p> <p>10 <b>this PowerPoint presentation.</b></p> <p>11       Q In the context with which you are</p> <p>12 familiar with Product Information Management, who</p> <p>13 within Lawson has responsibilities related to that</p> <p>14 service offering?</p> <p>15       <b>A It would be my organization.</b></p> <p>16       Q Could you turn to the slide on the page</p> <p>17 with the Bates number ending 234.</p> <p>18       <b>A Yes.</b></p> <p>19       Q And do you see at the bottom of the</p> <p>20 slide, there's a representation of the M3 Business</p> <p>21 Engine?</p> <p>22       <b>A Yes.</b></p>	<p>175</p> <p>1       M3 product line?</p> <p>2       <b>A The answer is quite clearly no, since</b></p> <p>3 <b>Dagfinn doesn't work for the standard organization.</b></p> <p>4 <b>So whatever this is produced for, it can never be</b></p> <p>5 <b>part of my organization.</b></p> <p>6       Q Can you turn to the slide on the page</p> <p>7 with the Bates number ending 240. And do you see</p> <p>8 on the slide there's a reference to import, in the</p> <p>9 middle of the page.</p> <p>10       <b>A Yes.</b></p> <p>11       Q Do you know what import function is being</p> <p>12 illustrated on this slide?</p> <p>13       <b>A No. These are just screen -- no. These</b></p> <p>14 <b>are just screenshots that could be from whatever.</b></p> <p>15 <b>They are not part of any of our standard solution.</b></p> <p>16 <b>This could be anything.</b></p> <p>17       Q What's the Movex Workplace?</p> <p>18       <b>A Movex Workplace? Movex was the name of</b></p> <p>19 <b>the product when -- before the merger.</b></p> <p>20       Q And what functionality did the Movex</p> <p>21 Workplace include?</p> <p>22       <b>A In this context I don't know, because</b></p>
<p>174</p> <p>1       Q And up at the top of the slide, there are</p> <p>2 some references to -- well, the title on the slide</p> <p>3 references import items. And one of the bullets on</p> <p>4 the right hand top part of the slide makes a</p> <p>5 reference to "Info from external system - product</p> <p>6 catalogs," do you see that?</p> <p>7       <b>A Yes.</b></p> <p>8       Q Do you know what product catalogs are</p> <p>9 being referenced there?</p> <p>10       <b>A No, since I don't know where this</b></p> <p>11 <b>PowerPoint is produced, from what context.</b></p> <p>12       Q What external product catalogs would be</p> <p>13 imported into the M3 system?</p> <p>14       <b>A I'm not sure I understand.</b></p> <p>15       Q Does the M3 system make use of external</p> <p>16 product catalogs in any manner?</p> <p>17       <b>A In the context of these PowerPoints, I</b></p> <p>18 <b>don't know what they refer to here, since it's not</b></p> <p>19 <b>part of our standard solution. This is</b></p> <p>20 <b>something...</b></p> <p>21       Q Do you know if this is a solution that's</p> <p>22 currently under development with reference to the</p>	<p>176</p> <p>1       <b>this is a screenshot of something.</b></p> <p>2       Q Well, just at a high level, what</p> <p>3 functionality are you familiar with?</p> <p>4       <b>A Workplace as a word exists today, and it</b></p> <p>5 <b>is our thin client of M3.</b></p> <p>6       Q And what functionality does it have?</p> <p>7       <b>A It is our thin client to all of the M3</b></p> <p>8 <b>functionality. So it enables you to run M3 over</b></p> <p>9 <b>Internet, if you wish, as a thin client. And I can</b></p> <p>10 <b>judge by the screenshot that this is something</b></p> <p>11 <b>special. It's not standard.</b></p> <p>12       Q Do you know if this was something that</p> <p>13 was implemented for a particular customer?</p> <p>14       <b>A I don't know that. But it's special.</b></p> <p>15 <b>It's --</b></p> <p>16       Q How can you tell that it's special and</p> <p>17 not standard?</p> <p>18       <b>A Because it says "MHS 200." That function</b></p> <p>19 <b>doesn't exist in the standard system. On the --</b></p> <p>20 <b>you drew my attention to something called 240 at</b></p> <p>21 <b>the end.</b></p> <p>22       Q Yes.</p>

<p>177</p> <p>1       <b>A</b>   And on the top there, it says "External</p> <p>2       <b>item toolbox."</b> "External item toolbox," the word</p> <p>3       <b>doesn't exist in standard. And then it says "MHS</b></p> <p>4       <b>200."</b></p> <p>5       Q    Yes.</p> <p>6       <b>A</b>   Doesn't exist.</p> <p>7       Q    Do you know if this was created as a</p> <p>8       custom application for a particular customer?</p> <p>9       <b>A</b>   I don't dare to say.</p> <p>10      Q    Can you turn to the slide on the page</p> <p>11      with the Bates number ending 244.</p> <p>12      <b>A</b>   244.</p> <p>13      Q    And it says on that page, "Screenshots</p> <p>14      from our demo Supplier Portal." Do you know what</p> <p>15      demo Supplier Portal Lawson may have?</p> <p>16      <b>A</b>   Since this comes from the same document,</p> <p>17      <b>I don't know, because I don't know of this</b></p> <p>18      <b>document.</b></p> <p>19      Q    Do you know of the Supplier Portal</p> <p>20      outside of the context of this document?</p> <p>21      <b>A</b>   I -- we don't have a Supplier Portal</p> <p>22      <b>today for M3. That much I know.</b></p>	<p>179</p> <p>1       <b>A</b>   Correct.</p> <p>2       Q    What's the nature of the functionality</p> <p>3       associated with the Supplier Portal that you</p> <p>4       currently have under development?</p> <p>5       <b>A</b>   As I said earlier, it's aimed to -- an</p> <p>6       <b>audience of our fashion customers, where they have</b></p> <p>7       <b>offshore activities, where they have manufacturing</b></p> <p>8       <b>offshore, typically in Europe, you have</b></p> <p>9       <b>manufacturing in eastern Europe or south Europe or</b></p> <p>10      <b>in Africa, and then you communicate with your</b></p> <p>11      <b>suppliers that manufactures a garment or -- yes,</b></p> <p>12      <b>textiles for you.</b></p> <p>13      <b>It's aimed for that collaborative process</b></p> <p>14      <b>of communicating quantities and dates and how much</b></p> <p>15      <b>to manufacture and to ship, and when.</b></p> <p>16      Q    Can --</p> <p>17      <b>A</b>   So it is to assimilate the process, if</p> <p>18      <b>you remember earlier we talked about M3, it's to</b></p> <p>19      <b>assimilate the process whereas a supplier can act</b></p> <p>20      <b>as any kind of production center for you.</b></p> <p>21      Q    Can the supplier upload product catalogs</p> <p>22      through the -- or is the functionality for supplier</p>
<p>178</p> <p>1       Q    Is one under development?</p> <p>2       <b>A</b>   Yes. Early stage.</p> <p>3       Q    Pardon me?</p> <p>4       <b>A</b>   Early. Yes.</p> <p>5       Q    "Early stage," is that what you said?</p> <p>6       <b>A</b>   Yes.</p> <p>7       Q    Does it have a projected time for</p> <p>8       release?</p> <p>9       <b>A</b>   No.</p> <p>10      Q    At what stage in the development is the</p> <p>11      Supplier Portal?</p> <p>12      <b>A</b>   What do you mean? We don't communicate</p> <p>13      <b>unless we have decided general availability date.</b></p> <p>14      <b>And even when that's decided, we do that with a</b></p> <p>15      <b>big, big disclaimer that it's a plan which might</b></p> <p>16      <b>change, and we don't even have that for this</b></p> <p>17      <b>functionality yet, so...</b></p> <p>18      Q    So you haven't --</p> <p>19      <b>A</b>   And it has nothing to do with this.</p> <p>20      Q    You haven't set any time for general</p> <p>21      availability of the Supplier Portal that you</p> <p>22      currently have under development?</p>	<p>180</p> <p>1       product catalog upload contemplated for the</p> <p>2       Supplier Portal under development?</p> <p>3       <b>A</b>   It's irrelevant. It's not relevant</p> <p>4       <b>for -- but as I said, it's very early days, and</b></p> <p>5       <b>it's in the middle of the process. But a catalog</b></p> <p>6       <b>wouldn't be relevant in that context of a supply</b></p> <p>7       <b>portal, as discussed earlier today. But not based</b></p> <p>8       <b>on these documents.</b></p> <p>9       Q    Can you turn to the slide on the page</p> <p>10      with the Bates number ending 246.</p> <p>11      <b>A</b>   Yes.</p> <p>12      Q    Does the Supplier Portal that you're</p> <p>13      familiar with that's under development include</p> <p>14      functionality for a catalog browser such as shown</p> <p>15      on this page?</p> <p>16      <b>A</b>   No.</p> <p>17      Q    Does this catalog browser functionality</p> <p>18      exist with respect to the Supply Center in the</p> <p>19      e-Procurement application?</p> <p>20      <b>A</b>   As presented in this document on this</p> <p>21      <b>paper, no.</b></p> <p>22      Q    Is there a catalog browser functionality</p>

<p>181</p> <p>1 associated with the Supply Center in the</p> <p>2 e-Procurement application?</p> <p>3 <b>A In the e-Procurement application, as a</b></p> <p>4 <b>supplier, you were able to sort of upload your</b></p> <p>5 <b>products. And what you have uploaded can be</b></p> <p>6 <b>viewed, but only your catalogs that you have</b></p> <p>7 <b>uploaded. And it's not really a catalog browser</b></p> <p>8 <b>per se. I don't know what it is. But...</b></p> <p>9 Q Does content manager for the buyer have</p> <p>10 the functionality to browse different catalogs in</p> <p>11 some part of the e-Procurement application?</p> <p>12 <b>A You have to repeat that question. Does</b></p> <p>13 <b>the --</b></p> <p>14 Q Does a content manager for the buyer have</p> <p>15 the functionality available to browse different</p> <p>16 catalogs that might be stored in some part of the</p> <p>17 e-Procurement application?</p> <p>18 <b>A The content manager is at the buyer --</b></p> <p>19 <b>I'm not sure I understand what you mean.</b></p> <p>20 Q Well, this screen --</p> <p>21 <b>A This screen?</b></p> <p>22 Q -- is illustrating that files are coming</p>	<p>183</p> <p>1 illustrate how that might appear, or is a screen</p> <p>2 similar to this presented to a user of the</p> <p>3 e-Procurement application?</p> <p>4 <b>A As I said, I don't really know what this</b></p> <p>5 <b>is. My answer is no. But I don't know what this</b></p> <p>6 <b>spreadsheet is, so -- I don't know where it comes</b></p> <p>7 <b>from. And I don't recognize it as anything in the</b></p> <p>8 <b>standard software. I don't recognize it as</b></p> <p>9 <b>anything in the standard software.</b></p> <p>10 <b>MS. ALBERT: Let me have the reporter</b></p> <p>11 <b>mark as Billgren Exhibit 15 a presentation entitled</b></p> <p>12 <b>"M3 e-Procurement 7.X for U.S." It bears</b></p> <p>13 <b>production numbers LE 00219767 through 801.</b></p> <p>14 <b>(Billgren Exhibit 15 was marked for</b></p> <p>15 <b>identification and attached to the deposition</b></p> <p>16 <b>transcript.)</b></p> <p>17 <b>BY MS. ALBERT:</b></p> <p>18 <b>Q Are you familiar with the document that's</b></p> <p>19 <b>been marked as Billgren Exhibit 15?</b></p> <p>20 <b>A I am.</b></p> <p>21 <b>Q And what is this document?</b></p> <p>22 <b>A It is a PowerPoint describing -- it's an</b></p>
<p>182</p> <p>1 in either as text files, Excel files, or XML files.</p> <p>2 Would a screen similar to this be presented to</p> <p>3 somebody in the buyer organization that would be</p> <p>4 looking to see what supplier catalogs had been</p> <p>5 uploaded to the Supply Center, and then go and look</p> <p>6 to see if the content had been approved so that it</p> <p>7 could be published to the Meta Catalog in the Buy</p> <p>8 Center?</p> <p>9 <b>A I mean, it was a long question. I</b></p> <p>10 <b>think -- I mean, I would never refer to this 246</b></p> <p>11 <b>page to anything that relates to e-Procurement. I</b></p> <p>12 <b>don't know what this is.</b></p> <p>13 Q Can you turn to the slide on the page</p> <p>14 with the Bates number ending 248.</p> <p>15 <b>A Yes.</b></p> <p>16 Q And if you see at the top of that screen,</p> <p>17 there's a reference to "Microsoft Excel Article</p> <p>18 Import 2.0 XLS."</p> <p>19 <b>A I was just reading in Norwegian.</b></p> <p>20 Q If a supplier had imported its catalog</p> <p>21 items into the Supply Center using the Excel</p> <p>22 spreadsheet method, is this -- does this screen</p>	<p>184</p> <p>1 <b>internal draft PowerPoint used to describe a</b></p> <p>2 <b>potential idea of doing further development on</b></p> <p>3 <b>e-Procurement.</b></p> <p>4 Q Was this PowerPoint ever finalized?</p> <p>5 <b>A If the PowerPoint was ever finalized?</b></p> <p>6 Q It says "Draft" at the top. You</p> <p>7 indicated that this was an internal draft.</p> <p>8 <b>A Yes.</b></p> <p>9 Q Was it ever formalized into an official</p> <p>10 presentation?</p> <p>11 <b>A The answer is that the proposal indicated</b></p> <p>12 <b>here as well as the PowerPoint was never approved</b></p> <p>13 <b>to go any further than draft. So this project</b></p> <p>14 <b>or -- was not moved forward with.</b></p> <p>15 Q To whom was this document disseminated?</p> <p>16 <b>A "Disseminated" means?</b></p> <p>17 Q Distributed.</p> <p>18 <b>A It says here it was something that was</b></p> <p>19 <b>present by product management, my organization, to</b></p> <p>20 <b>the management team at the time, as a presentation.</b></p> <p>21 <b>And it was not approved or endorsed.</b></p> <p>22 Q How do you know that it was not approved</p>

<p>185</p> <p>1 or endorsed?</p> <p>2 <b>A Otherwise we would have moved on with the</b></p> <p>3 <b>project. And we did not. It was stopped.</b></p> <p>4 Q Can you turn to page 2 of the</p> <p>5 presentation that's on the page with the Bates</p> <p>6 number ending 768.</p> <p>7 <b>A Yes.</b></p> <p>8 Q Underneath the heading M3 e-Procurement</p> <p>9 5.0, the second item reads, "Current version</p> <p>10 implemented at SECO tools. Other 27 customers</p> <p>11 either on older versions or implementing." So does</p> <p>12 that indicate that at the time of this</p> <p>13 presentation, November 5th, 2006, there were only</p> <p>14 28 customers of M3 e-Procurement?</p> <p>15 <b>A As I said earlier, I wasn't on top of my</b></p> <p>16 <b>head the number of customers. But this indicates</b></p> <p>17 <b>at this time that the total was no more than 27,</b></p> <p>18 <b>yes. And it also indicates that we assumed that</b></p> <p>19 <b>the e-Procurement product was not readied for the</b></p> <p>20 <b>U.S. market.</b></p> <p>21 Q And as of the time of this presentation,</p> <p>22 it did indicate that the e-Procurement product has</p>	<p>187</p> <p>1 <b>And we didn't.</b></p> <p>2 Q But now you have a sale in the U.S.</p> <p>3 market. So my question to you is at what time did</p> <p>4 you first launch the product in the U.S. market.</p> <p>5 <b>A It's part of the M3 portfolio. But it's</b></p> <p>6 <b>never been pinpointed as something that we focused</b></p> <p>7 <b>on for the U.S. market, meaning that we haven't</b></p> <p>8 <b>sort of really expected any revenue stream from it.</b></p> <p>9 <b>This proposal was to sort of maybe change that</b></p> <p>10 <b>situation. And this didn't take off. So it's</b></p> <p>11 <b>just -- it's not been taken off, but it's not been</b></p> <p>12 <b>focused on for the U.S. market.</b></p> <p>13 Q It indicates under "Challenges" that the</p> <p>14 current pricing for M3 e-Procurement is too high</p> <p>15 except for large organizations. Since the time of</p> <p>16 this presentation, has the pricing for M3</p> <p>17 e-Procurement been modified?</p> <p>18 <b>A No.</b></p> <p>19 Q So it's still being sold --</p> <p>20 <b>A But this is one challenge out of many.</b></p> <p>21 <b>And this list here is by no means a full list of</b></p> <p>22 <b>challenges. It's just it was highlighted for the</b></p>
<p>186</p> <p>1 not been readied for the U.S. market. Currently</p> <p>2 you are now offering the e-Procurement product in</p> <p>3 the U.S. market, correct?</p> <p>4 <b>A It's part of an M3 offering. In this</b></p> <p>5 <b>context, in this draft presentation, it's aimed to</b></p> <p>6 <b>say do we believe that we have something that we</b></p> <p>7 <b>can take to the market. And under the headline</b></p> <p>8 <b>"Challenge," it indicates we don't. And we haven't</b></p> <p>9 <b>sold anything either since then. So it was -- but</b></p> <p>10 <b>it has not been withdrawn. Just allowing it to be</b></p> <p>11 <b>there doesn't mean that we believe we have</b></p> <p>12 <b>something that is competitive on the marketplace.</b></p> <p>13 Q When was the M3 e-Procurement application</p> <p>14 readied for the U.S. market?</p> <p>15 <b>A In this context, of this presentation,</b></p> <p>16 <b>nothing has been done to --</b></p> <p>17 Q I understand that. But when did you</p> <p>18 consider the M3 e-Procurement application to be</p> <p>19 ready for presentation to the U.S. market?</p> <p>20 <b>A I'm not sure I understand. The</b></p> <p>21 <b>interpretation here was readied by the fact that we</b></p> <p>22 <b>felt that we had something that was competitive.</b></p>	<p>188</p> <p>1 <b>management team at the time. But even though with</b></p> <p>2 <b>these challenges, the decision was not to move</b></p> <p>3 <b>ahead.</b></p> <p>4 Q My question to you just was, has the</p> <p>5 price for the M3 e-Procurement application been</p> <p>6 modified since the time of this presentation?</p> <p>7 <b>A To my knowledge, no.</b></p> <p>8 Q Thank you. So at the time of this</p> <p>9 presentation, there were 28 customers of M3</p> <p>10 e-Procurement. How many are there now?</p> <p>11 <b>A As I said earlier, on top of my head, I</b></p> <p>12 <b>don't dare to answer.</b></p> <p>13 Q If you wanted to find a list of all of</p> <p>14 the M3 e-Procurement customers, where would you go</p> <p>15 to locate that list?</p> <p>16 <b>A As I said earlier, I would go to my</b></p> <p>17 <b>product manager.</b></p> <p>18 Q Can you turn to the slide on the page of</p> <p>19 the presentation with the Bates number ending 769.</p> <p>20 <b>A Yes.</b></p> <p>21 <b>Q At the top of the slide, the project</b></p> <p>22 <b>description reads, "Deliver enhancements to M3</b></p>

<p>189</p> <p>1 e-Procurement that will make the application more</p> <p>2 appropriate for the U.S. market and deliver</p> <p>3 functionality such as Punchout, Multi-Step</p> <p>4 Requisition Flows, Stock Item Handling, and Budget</p> <p>5 Checking that will encourage existing customers to</p> <p>6 upgrade and expand the use of e-Procurement.</p> <p>7 Has the Punchout functionality been added</p> <p>8 to the M3 e-Procurement application?</p> <p>9 A No.</p> <p>10 Q Is there any plan to add that</p> <p>11 functionality to the M3 e-Procurement application</p> <p>12 in the future?</p> <p>13 A No.</p> <p>14 Q Is there any project where that</p> <p>15 functionality is under development for modification</p> <p>16 of the e-Procurement application?</p> <p>17 A Now you used the word "modification."</p> <p>18 But there is no project on the way aiming for</p> <p>19 punchout in our standard solution.</p> <p>20 Q Why did you decide not to implement that</p> <p>21 functionality to the e-Procurement application?</p> <p>22 A The M3 main marketplace for us is to</p>	<p>191</p> <p>1 A Not in detail.</p> <p>2 Q How about generally, do you recall?</p> <p>3 A As mentioned in this presentation, they</p> <p>4 were some of the customers who was part of the</p> <p>5 endorsement. So if you go back to the 769, there</p> <p>6 it's mentioned a number of ideas that we wanted to</p> <p>7 do, whereas Autoliv were behind some of those.</p> <p>8 Q Do you see back on the page with the</p> <p>9 Bates number ending 771, there are some references</p> <p>10 to industry analysts?</p> <p>11 A Yes.</p> <p>12 Q For example, ARC Advisory and the</p> <p>13 Aberdeen Group. Do you see that?</p> <p>14 A Yes.</p> <p>15 Q What industry analysts does Lawson rely</p> <p>16 on?</p> <p>17 A Amongst others, these, and AMR and</p> <p>18 Gartner.</p> <p>19 Q Who within Lawson receives copies of</p> <p>20 industry analyst reports?</p> <p>21 A I am one, since I am in product</p> <p>22 management.</p>
<p>190</p> <p>1 make, move, maintain organizations. And there they</p> <p>2 have a very, very limited need for indirect</p> <p>3 material. And adding this at the time was</p> <p>4 considered, and it still is considered, not high</p> <p>5 enough ROI for us as an organization.</p> <p>6 (The reporter asked for clarification.)</p> <p>7 A ROI, return of investment.</p> <p>8 Q Can you turn to the slide on the page</p> <p>9 with the Bates number ending 771.</p> <p>10 A 771.</p> <p>11 Q Do you see at the top of the page under</p> <p>12 "Customer Endorsements" that Autoliv was requesting</p> <p>13 some enhancements in order to roll out the</p> <p>14 e-Procurement to additional locations?</p> <p>15 A Yes.</p> <p>16 Q Do you recall the nature of the</p> <p>17 enhancements that Autoliv was requesting?</p> <p>18 A Not in detail. I do recall that it did</p> <p>19 not roll out, since we didn't move ahead with the</p> <p>20 project.</p> <p>21 Q Do you recall any of the enhancements</p> <p>22 that Autoliv was requesting?</p>	<p>192</p> <p>1 Q Do other members of your product</p> <p>2 management team receive copies of industry</p> <p>3 analysts' reports?</p> <p>4 A Yes. They do.</p> <p>5 Q Do you know how widely industry analyst</p> <p>6 reports are distributed within the company?</p> <p>7 A To the degree that we are allowed to</p> <p>8 distribute them. Some of the reports are sort of</p> <p>9 limited usage by the analysts. But we have a very</p> <p>10 good working relationship with analysts.</p> <p>11 Q Within the M3 organization, do you know</p> <p>12 how widely industry analyst reports are</p> <p>13 distributed?</p> <p>14 A To the product management team,</p> <p>15 absolutely.</p> <p>16 Q How many people are in the product</p> <p>17 management team?</p> <p>18 A In my team we are 20, with me.</p> <p>19 Q So 20 people on your team would receive</p> <p>20 copies of industry analyst reports?</p> <p>21 A They would not receive the same copy, all</p> <p>22 of them. They are responsible for different areas,</p>

<p>193</p> <p>1 and they would receive copies of reports that make</p> <p>2 sense for them. And not all of them would receive</p> <p>3 copies either.</p> <p>4 Q Which industry analyst reports do you</p> <p>5 receive?</p> <p>6 A I receive from AMR, Gartner, and</p> <p>7 Aberdeen. It's more topic-related than related to</p> <p>8 analysts.</p> <p>9 Q What topics -- for what topics do you</p> <p>10 receive industry analyst reports?</p> <p>11 A Reports that relate to the M3 side of the</p> <p>12 Lawson business.</p> <p>13 Q Do you receive industry analyst reports</p> <p>14 relating to e-Procurement?</p> <p>15 A In this particular case, since M3 has an</p> <p>16 application or a module, e-Procurement, and we were</p> <p>17 contemplating doing something which we didn't, we</p> <p>18 made sure that we had analyst report. Hence this</p> <p>19 page. But other than that, on a regular basis</p> <p>20 today, no, we didn't move ahead with this project,</p> <p>21 i.e. we did not invest in e-Procurement, and didn't</p> <p>22 believe it was something -- for now, I receive very</p>	<p>195</p> <p>1 MS. ALBERT: Okay. I would appreciate</p> <p>2 that.</p> <p>3 BY MS. ALBERT:</p> <p>4 Q Within the M3 product management, is</p> <p>5 there any kind of centralized repository where you</p> <p>6 maintain copies of industry analyst reports?</p> <p>7 A They are normally distributed via e-mail.</p> <p>8 So, I mean, it's up to each individual.</p> <p>9 Q Could you turn to the slide on the page</p> <p>10 with the Bates number ending 774.</p> <p>11 A Yes.</p> <p>12 Q On that slide, there's a reference to a</p> <p>13 \$28,080 U.S. base price plus an \$180 or less per</p> <p>14 user. Do you know what the current base price is</p> <p>15 of the M3 e-Procurement application?</p> <p>16 A My understanding of this slide is that</p> <p>17 this is a proposed price, hence we have done</p> <p>18 development to be able to establish potential</p> <p>19 income at the end.</p> <p>20 Q Do you know what the current base price</p> <p>21 is for M3 e-Procurement?</p> <p>22 A Not on top of my head.</p>
<p>194</p> <p>1 little in the e-Procurement area.</p> <p>2 Q Were your files searched in order to</p> <p>3 locate documents responsive to ePlus's discovery</p> <p>4 requests in this litigation?</p> <p>5 A Yes.</p> <p>6 Q Do you know if anyone searched your files</p> <p>7 to try to locate industry analyst reports that you</p> <p>8 might have copies of?</p> <p>9 A I don't know that. I mean, my entire</p> <p>10 file structure was, how do you say -- I was about</p> <p>11 to say imported.</p> <p>12 Q Imaged?</p> <p>13 A Yes. So...</p> <p>14 Q Do you know if your e-mails were</p> <p>15 collected from your e-mail box?</p> <p>16 A Yes.</p> <p>17 MS. ALBERT: I don't think we've received</p> <p>18 any of Mr. Billgren's e-mails to date.</p> <p>19 MR. SCHULTZ: You have not?</p> <p>20 MS. ALBERT: Right.</p> <p>21 MR. SCHULTZ: I can check on that for</p> <p>22 you.</p>	<p>196</p> <p>1 Q Do you know, if a company wishes to</p> <p>2 license the Design Center in addition to the Buy</p> <p>3 Center and Supply Center, would they currently have</p> <p>4 to pay an additional license fee for that?</p> <p>5 A Yes.</p> <p>6 Q And if a customer wanted to have the XML</p> <p>7 adapter with the e-Procurement application, would</p> <p>8 they have to pay an additional license fee in order</p> <p>9 to obtain that functionality?</p> <p>10 A Yes.</p> <p>11 Q And with respect to the base price for</p> <p>12 the e-Procurement application, is there a per user</p> <p>13 fee in addition to the base price currently?</p> <p>14 A Yes. My understanding, yes.</p> <p>15 Q Can you turn to the slide on the page</p> <p>16 with the Bates number ending 782.</p> <p>17 A Yes.</p> <p>18 Q And on that page the title is "Lawson M3</p> <p>19 e-Procurement SWOT."</p> <p>20 A Yes.</p> <p>21 Q Underneath the "Weaknesses" part of the</p> <p>22 slide, there's a reference to "relatively high</p>



<p>197</p> <p>1 price." How does Lawson's price for the</p> <p>2 e-Procurement application compare to its</p> <p>3 competition?</p> <p>4 <b>A Our understanding is that we are --</b></p> <p>5 <b>comparative to what we offer, we're high priced.</b></p> <p>6 <b>Q So --</b></p> <p>7 <b>A Since e-Procurement is a complementary</b></p> <p>8 <b>solution to our main offering, we are okay with</b></p> <p>9 <b>that as per se, and see the higher price point as</b></p> <p>10 <b>sort of still a value for us, because it's not a</b></p> <p>11 <b>volume product for us.</b></p> <p>12 <b>Q With respect to which competitor is the</b></p> <p>13 <b>e-Procurement price relatively high?</b></p> <p>14 <b>A To the competitors mentioned here in this</b></p> <p>15 <b>analysis.</b></p> <p>16 <b>Q Who are the competitors mentioned in this</b></p> <p>17 <b>analysis?</b></p> <p>18 <b>A Or was that in another -- no, it was</b></p> <p>19 <b>mentioned in the -- in the battle card.</b></p> <p>20 <b>Q So I think the battle card referenced SAP</b></p> <p>21 <b>and Oracle as two competitors.</b></p> <p>22 <b>A Tier 1 competitors, yes.</b></p>	<p>199</p> <p>1 heading "Customer size," the slide indicates that</p> <p>2 typically you targeted larger customers with</p> <p>3 employees greater than 100.</p> <p>4 <b>A 500.</b></p> <p>5 <b>Q 500, I'm sorry. "But we have small happy</b></p> <p>6 <b>customers with approximately 100 employees." Which</b></p> <p>7 <b>of your customers have greater than 500 employees?</b></p> <p>8 <b>A I would say all of the ones mentioned in</b></p> <p>9 <b>this, as endorsed customers.</b></p> <p>10 <b>Q Which of your customers have</b></p> <p>11 <b>approximately 100 employees?</b></p> <p>12 <b>A On top of my head I can't repeat any</b></p> <p>13 <b>names. But the assessment in this presentation was</b></p> <p>14 <b>that that wasn't strong enough for us.</b></p> <p>15 <b>Q What do you mean, that wasn't strong</b></p> <p>16 <b>enough?</b></p> <p>17 <b>A To move ahead with the proposal. The</b></p> <p>18 <b>proposal indicates also that we maybe should</b></p> <p>19 <b>downsize the solution, different price point,</b></p> <p>20 <b>different target group. And the joint decision of</b></p> <p>21 <b>the management team was not to. So...</b></p> <p>22 <b>Q Can you turn to the slide on the page</b></p>
<p>198</p> <p>1 <b>Q So the price of Lawson's e-Procurement</b></p> <p>2 <b>application is relatively high compared to the</b></p> <p>3 <b>comparable applications being offered by SAP and</b></p> <p>4 <b>Oracle, is that Lawson's understanding?</b></p> <p>5 MR. SCHULTZ: I object to form.</p> <p>6 THE WITNESS: I wouldn't express myself</p> <p>7 like that. It's our understanding that our value</p> <p>8 is highly priced compared to the tier 1 players.</p> <p>9 <b>BY MS. ALBERT:</b></p> <p>10 <b>Q Do you mean that you're offering a high</b></p> <p>11 <b>value compared to --</b></p> <p>12 <b>A No.</b></p> <p>13 <b>Q -- the applications offered by the tier 1</b></p> <p>14 <b>players? I don't understand. You said, "It's our</b></p> <p>15 <b>understanding that our value is highly priced</b></p> <p>16 <b>compared to the tier 1 players." Can you explain</b></p> <p>17 <b>what you mean by that?</b></p> <p>18 <b>A E-Procurement -- it's not our -- one of</b></p> <p>19 <b>our focused solutions. So it's not priced to be</b></p> <p>20 <b>competitive. That's what I'm saying.</b></p> <p>21 <b>Q Can you turn to the slide on the page</b></p> <p>22 <b>with the Bates number ending 784. Under the</b></p>	<p>200</p> <p>1 ending -- with the Bates number ending 790. And</p> <p>2 this slide is entitled "Competitive Position for</p> <p>3 Indirect Material Procurement." Are you there?</p> <p>4 <b>A I'm sorry. I'm here.</b></p> <p>5 <b>Q This slide is entitled "Competitive</b></p> <p>6 <b>Position for Indirect Material Procurement." And</b></p> <p>7 <b>there's a table with a number of functionalities</b></p> <p>8 <b>indicated on the left hand column. On the top of</b></p> <p>9 <b>the table there are a number of companies named,</b></p> <p>10 <b>including Lawson e-Procurement.</b></p> <p>11 <b>Do you consider the companies indicated</b></p> <p>12 <b>in this slide to be Lawson's competitors for the</b></p> <p>13 <b>e-Procurement application?</b></p> <p>14 <b>A Those were the companies we envisioned to</b></p> <p>15 <b>be our competitors should we have moved ahead and</b></p> <p>16 <b>tried to position ourselves with e-Procurement,</b></p> <p>17 <b>yes.</b></p> <p>18 <b>Q And you filled in the table indicating</b></p> <p>19 <b>various functionalities offered by your</b></p> <p>20 <b>competitors' products. How do you collect</b></p> <p>21 <b>information concerning the functionality of your</b></p> <p>22 <b>competitors' products?</b></p>

<p>201</p> <p>1 A Through whatever public material they</p> <p>2 might have on web pages.</p> <p>3 Q Have you ever --</p> <p>4 A And on some --</p> <p>5 Q I'm sorry.</p> <p>6 A No.</p> <p>7 Q Have you ever competed for a sale with</p> <p>8 respect to the e-Procurement application against</p> <p>9 ePlus?</p> <p>10 A No, not to my knowledge at all.</p> <p>11 Q Can you turn to the next page of the</p> <p>12 presentation. This slide presents a number of</p> <p>13 success criteria for the project. And the first</p> <p>14 bullet reads, "Have at least two solution</p> <p>15 consultants in Americas trained on e-Procurement."</p> <p>16 Was that done?</p> <p>17 A No.</p> <p>18 Q Do you have any solution consultants in</p> <p>19 the Americas trained on e-Procurement?</p> <p>20 A No.</p> <p>21 Q Towards -- the second bullet from the</p> <p>22 bottom of the page reads, "Implement lead</p>	<p>203</p> <p>1 training of our internal people.</p> <p>2 Q Have any webinars been prepared relating</p> <p>3 to the M3 e-Procurement application?</p> <p>4 A Not in this.</p> <p>5 Q Are any webinars made available to</p> <p>6 prospective customers relating to the M3</p> <p>7 e-Procurement application?</p> <p>8 A Now, that question was a bit -- because</p> <p>9 if someone wants to sort of understand, and that</p> <p>10 might happen, then of course we are prepared to do</p> <p>11 a WebEx, or explain.</p> <p>12 (The reporter asked for clarification.)</p> <p>13 A A WebEx, webinar, over the web, to</p> <p>14 explain the solution using any of these PowerPoints</p> <p>15 that we have said, and/or a demonstration of the</p> <p>16 product.</p> <p>17 Q Are there any webinars relating to the M3</p> <p>18 product line that are available on the Lawson.com</p> <p>19 website?</p> <p>20 A There are numerous webinars -- on the</p> <p>21 Lawson.com? Hmm. Almost a trick question, because</p> <p>22 from Lawson.com you can jump to MyLawson.com. And</p>
<p>202</p> <p>1 generation program in Americas." Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Was a lead generation program in the</p> <p>4 Americas implemented?</p> <p>5 A No.</p> <p>6 Q Can you turn to the next slide, on the</p> <p>7 page with the Bates number ending 792. Under the</p> <p>8 heading "Relaunch in Each Region" there are two</p> <p>9 bullets, the first one being "Training." Does</p> <p>10 Lawson provide training to customers of its</p> <p>11 e-Procurement application?</p> <p>12 A This PowerPoint doesn't talk about</p> <p>13 training to customers.</p> <p>14 Q Who does it talk about training to?</p> <p>15 A The relaunch would have meant that if we</p> <p>16 would have gone ahead with this idea, which we</p> <p>17 didn't, it would have meant that we would have said</p> <p>18 we would have had to relaunch the product, even --</p> <p>19 since it is available, sort of it's not taken off</p> <p>20 the list in the United States, but we recognize</p> <p>21 that no one really knows about it, so we need to</p> <p>22 relaunch it from a training perspective. So it's</p>	<p>204</p> <p>1 if you're a customer running live on MyLawson.com,</p> <p>2 you will then have support to -- you can see your</p> <p>3 contracts. It's our own customer portal. And</p> <p>4 there you can access webinar training on existing</p> <p>5 solutions.</p> <p>6 But I don't think we have anything there</p> <p>7 on e-Procurement. But for most of the other of the</p> <p>8 offerings. So via Lawson.com, as a maintenance</p> <p>9 paying customer, you can obtain a lot of</p> <p>10 information.</p> <p>11 MS. ALBERT: Can I request --</p> <p>12 THE WITNESS: But you need to log onto.</p> <p>13 MS. ALBERT: Can I request that a search</p> <p>14 be conducted of the MyLawson.com site for any</p> <p>15 webinars or any training material related to the M3</p> <p>16 e-Procurement application.</p> <p>17 MR. SCHULTZ: Yes. I believe that has</p> <p>18 been done. I'll confirm that.</p> <p>19 MS. ALBERT: Thank you. I believe I'm</p> <p>20 done with that exhibit.</p> <p>21 I'll have the reporter mark as Billgren</p> <p>22 Exhibit 16 a presentation entitled "M3</p>

<p>205</p> <p>1 e-Procurement." It bears production numbers LE</p> <p>2 00216433 through 453.</p> <p>3 (Billgren Exhibit 16 was marked for</p> <p>4 identification and attached to the deposition</p> <p>5 transcript.)</p> <p>6 BY MS. ALBERT:</p> <p>7 Q Are you familiar with the presentation</p> <p>8 that's been marked as Billgren Exhibit 16?</p> <p>9 A Yes, I am.</p> <p>10 Q And what was the purpose for this</p> <p>11 presentation?</p> <p>12 A My understanding, that this is a</p> <p>13 presentation made for, again, internal educational</p> <p>14 purposes by the product manager. And he has been</p> <p>15 co-assisted with a solution consultant, I think,</p> <p>16 for the Nordic market.</p> <p>17 Q To whom was the presentation given?</p> <p>18 A I don't know to whom this presentation</p> <p>19 has been given.</p> <p>20 Q Do you know when this presentation was</p> <p>21 created?</p> <p>22 A I don't know the exact date.</p>	<p>207</p> <p>1 A Yes.</p> <p>2 Q And there's a reference on that page to</p> <p>3 TINE BA. Is that an e-Procurement customer?</p> <p>4 A That is a dairy in Norway.</p> <p>5 Q And are they --</p> <p>6 A And they are an e-Procurement customer,</p> <p>7 yes.</p> <p>8 Q And it says on this slide that they</p> <p>9 implemented Lawson e-Procurement in 2007, correct?</p> <p>10 A Yes.</p> <p>11 Q It says that they are running OCI. Is</p> <p>12 that a reference to the Open Catalog Interface?</p> <p>13 A Yes.</p> <p>14 Q How does that work with the e-Procurement</p> <p>15 application?</p> <p>16 A As I said earlier, I mean, the Open</p> <p>17 Catalog Interface is open for anybody to use, to</p> <p>18 open up a catalog. And it's not part of our</p> <p>19 standard offering. But it's possible to use the</p> <p>20 OCI defined by SAP to make any kind of connectivity</p> <p>21 to any kind of catalog that has enabled itself to</p> <p>22 the OCI protocol or standards. Then of course when</p>
<p>206</p> <p>1 Q Do you know approximately when?</p> <p>2 A I would suspect within the -- no, I'm not</p> <p>3 sure exactly when this was done.</p> <p>4 Q Who is Fredrik Wikberg?</p> <p>5 A A solution consultant.</p> <p>6 Q Is he a consultant for a particular</p> <p>7 solution?</p> <p>8 A He works in the Nordic region and has</p> <p>9 knowledge and -- in e-Procurement, amongst other</p> <p>10 products.</p> <p>11 Q Is he still employed by Lawson?</p> <p>12 A Yes, to my understanding he is.</p> <p>13 Q You said this was an internal</p> <p>14 presentation. To whom was -- to what audience was</p> <p>15 this presentation directed?</p> <p>16 A I can't say to whom this has been</p> <p>17 presented to.</p> <p>18 Q Do you know who the intended audience</p> <p>19 was?</p> <p>20 A No.</p> <p>21 Q Can you turn to the slide on the page</p> <p>22 with the Bates number ending 442.</p>	<p>208</p> <p>1 you have done that, you can connect back as a</p> <p>2 modification to our solution or any other solution.</p> <p>3 Q Do you know if Lawson will assist a</p> <p>4 customer in implementing OCI functionality if they</p> <p>5 so request?</p> <p>6 A I don't know who actually assisted TINE</p> <p>7 in doing their OCI connectivities. I don't know</p> <p>8 who would have done that. But it's of course the</p> <p>9 customer's responsibility, not ours.</p> <p>10 Q Can you turn to the slide on the next</p> <p>11 page with the Bates number ending 443.</p> <p>12 A Yes.</p> <p>13 Q What screen display is presented on this</p> <p>14 slide?</p> <p>15 A This is an e-Procurement start screen, I</p> <p>16 would say. But it's been tailored for the specific</p> <p>17 use and need at the TINE implementation in Norway.</p> <p>18 Q And if the user on the left hand side of</p> <p>19 the screen -- there's a heading, "Requisition</p> <p>20 Handling," do you see that?</p> <p>21 A Yes.</p> <p>22 Q And if the user clicked on the button</p>

<p>209</p> <p>1 labeled "Request," what would be the screen that</p> <p>2 would be presented?</p> <p>3 A Depending on who he's logged on as, if</p> <p>4 I'm logged on as the buyer, then you would come to</p> <p>5 a screen where you can select amongst the products</p> <p>6 and the product order hierarchies and create a</p> <p>7 requisition.</p> <p>8 Q And if I had the approver role and I</p> <p>9 click on the "Approve" button, what screen would be</p> <p>10 presented?</p> <p>11 A I would come up with all the requisitions</p> <p>12 that I am responsible to approve so I can go in,</p> <p>13 view them, reject or approve them.</p> <p>14 Q And what type of user would have a role</p> <p>15 that would permit them to click on the "Receive"</p> <p>16 button?</p> <p>17 A That would be typically the requester.</p> <p>18 When I have received what I requested, then I will</p> <p>19 tell the system I have received it, and then if you</p> <p>20 have -- yes.</p> <p>21 Q Can you turn to the next page with the</p> <p>22 Bates number ending 444.</p>	<p>211</p> <p>1 (Pause in the proceedings.)</p> <p>2 THE VIDEOGRAPHER: This marks the</p> <p>3 beginning of tape number 4 in the deposition of</p> <p>4 Mr. Billgren. We're back on the record. The time</p> <p>5 is 5:40 p.m.</p> <p>6 BY MS. ALBERT:</p> <p>7 Q Mr. Billgren, referring back to the slide</p> <p>8 in Exhibit 16 on the page with the Bates number</p> <p>9 ending 444, if I click on the "Search" button on</p> <p>10 the left hand side of that screen, what's the next</p> <p>11 screen that would be presented to me?</p> <p>12 A You would get to -- I would have said</p> <p>13 that you would have get to -- but this is -- and</p> <p>14 it's a fair assumption, that you would get to</p> <p>15 screen 447. But you would get to another picture</p> <p>16 where you could have done a more detailed search.</p> <p>17 I'm not 100 percent sure if that's -- but</p> <p>18 typically.</p> <p>19 Q And underneath the button labeled</p> <p>20 "Catalog Products" --</p> <p>21 A Yes.</p> <p>22 Q -- there's product groups listed.</p>
<p>210</p> <p>1 A Yes.</p> <p>2 Q What screen is displayed on this page?</p> <p>3 A This is a standard screen. But as you</p> <p>4 see, I mean, all screens in a web applications are</p> <p>5 always tailored so that they have the font and</p> <p>6 whatever the customer wants to -- in this case,</p> <p>7 TINE, this Norwegian dairy. But this is the Buy</p> <p>8 Center home screen. So it's the start screen if</p> <p>9 you are a requester, you want to create a</p> <p>10 requisition. So it seems to me like it's a screen</p> <p>11 capture, that you click on the buy -- the request,</p> <p>12 and then you will end up here.</p> <p>13 Then to the left and side you can see you</p> <p>14 have some products.</p> <p>15 MS. ALBERT: The videographer has</p> <p>16 indicated that he needs some time to change the</p> <p>17 tape. So can we recess briefly to allow the tape</p> <p>18 to be changed?</p> <p>19 MR. SCHULTZ: Yes.</p> <p>20 THE VIDEOGRAPHER: This marks the end of</p> <p>21 tape number 3 in the deposition of Mr. Billgren.</p> <p>22 Going off the record. The time is 5:35 p.m.</p>	<p>212</p> <p>1 A Yes.</p> <p>2 Q So are those the product groups that</p> <p>3 would be available to the user to conduct searches</p> <p>4 by using the product groups?</p> <p>5 A Yes. I mean, it's -- yes. And if you</p> <p>6 would click or expand any one of those, you will</p> <p>7 end up on page 445.</p> <p>8 Q If I click on the link at the top of the</p> <p>9 screen labeled "Shopping Cart," what screen would</p> <p>10 be presented?</p> <p>11 A Your shopping cart.</p> <p>12 Q So if you had selected items in your</p> <p>13 catalog search that you wanted to requisition,</p> <p>14 those would be added to your shopping cart; is that</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q If you click on the link labeled</p> <p>18 "Requisitions," what screen would be presented?</p> <p>19 A If you have ongoing requisitions that you</p> <p>20 have not yet -- that's not yet been approved. You</p> <p>21 as a buyer, now, I've logged on here as a buyer.</p> <p>22 Q Right.</p>

<p>213</p> <p>1 A And that could be an individual.</p> <p>2 Q Can you turn to the slide on the page</p> <p>3 with the Bates number ending 445.</p> <p>4 A Yes.</p> <p>5 Q Now, in this page, on the left hand</p> <p>6 portion of the screen, do you understand it to be</p> <p>7 displaying what would happen if the buyer, user,</p> <p>8 had clicked on the tab labeled "Non-Catalog</p> <p>9 Products" and expanded that?</p> <p>10 A Yes.</p> <p>11 Q So what's meant by the term "Non-Catalog</p> <p>12 Products"?</p> <p>13 A The term is -- I mean, the e-Procurement</p> <p>14 solution is meant to handle all kinds of</p> <p>15 procurement that doesn't happen with the</p> <p>16 replenishment type direct material normally in M3.</p> <p>17 And then you have catalog products, which is</p> <p>18 products where you have a supplier or a vendor who</p> <p>19 have such a strong relationship, you can convince</p> <p>20 him to upload his product catalogs or list of</p> <p>21 products.</p> <p>22 Then you have a lot of other stuff you</p>	<p>215</p> <p>1 implementation for this Norwegian customer, when</p> <p>2 you mark a product group, it's highlighted red.</p> <p>3 And they have -- and you display, in this case you</p> <p>4 display -- the filter is set up so you display what</p> <p>5 suppliers you can use when you want to go for</p> <p>6 laboratory products.</p> <p>7 Q So --</p> <p>8 A In non-catalog, meaning you don't have a</p> <p>9 catalog -- you have only listed suppliers in this</p> <p>10 case.</p> <p>11 Q So with respect to the link next to VWR</p> <p>12 International, there is a type OCI, and there is a</p> <p>13 red -- some red words highlighted there, "External</p> <p>14 Website." Is that going to punch out to the VWR</p> <p>15 external website to go shop for those laboratory</p> <p>16 items?</p> <p>17 A I wouldn't use the word "punchout." But</p> <p>18 it's going to use the OCI interface to jump to that</p> <p>19 web page.</p> <p>20 Q And if you turn to the next slide on the</p> <p>21 page with the Bates number ending 447, is that what</p> <p>22 has happened, that you've used the Open Catalog</p>
<p>214</p> <p>1 want to buy, you want to offer your employees. In</p> <p>2 this case this is the support organization inside</p> <p>3 this dairy, where they order gas or electricity or</p> <p>4 furniture or clothing, and they don't have any kind</p> <p>5 of catalog or anything, but they already know what</p> <p>6 typically service technicians in this dairy is</p> <p>7 allowed to buy.</p> <p>8 So they have created product groups for</p> <p>9 them so they can go in and view items, and then</p> <p>10 they inspect the supplier and create a requisition</p> <p>11 that's mailed to that supplier. And there are</p> <p>12 items that are not in the catalog at all. This is</p> <p>13 actually -- yes.</p> <p>14 Q Can you turn to --</p> <p>15 A It's one of the key features of -- that</p> <p>16 you can do non-catalog products.</p> <p>17 Q Can you turn to the next page of the</p> <p>18 exhibit, with the Bates number ending 446.</p> <p>19 A Yes.</p> <p>20 Q What is this screen that's displayed on</p> <p>21 this page?</p> <p>22 A You see they have -- for this</p>	<p>216</p> <p>1 Interface to jump to that VWR external website?</p> <p>2 A Yes.</p> <p>3 Q And is this screen presenting the search</p> <p>4 user interface at the VWR website?</p> <p>5 A That's my understanding, yes. And all of</p> <p>6 a sudden, everything is in Norwegian.</p> <p>7 Q So do you have an understanding that if</p> <p>8 you use the Open Catalog Interface to shop at a</p> <p>9 supplier's website, that once you select items to</p> <p>10 add to your basket at that website, they can be</p> <p>11 brought back into your shopping cart in the M3</p> <p>12 e-Procurement application?</p> <p>13 A Since this is not a standard</p> <p>14 functionality, this is nothing we do in the</p> <p>15 standard solution today, you can tailor this use of</p> <p>16 OCI to whatever way the customer wanted to -- not</p> <p>17 whatever, but almost to whatever way the customer</p> <p>18 wants to use it, TINE in this case, and I don't</p> <p>19 know exactly how they have tailored. But the idea</p> <p>20 is of course you bring the information of the</p> <p>21 product back with you to your requisition.</p> <p>22 So it's a copy and paste. And the OCI</p>

<p>217</p> <p>1 interface, my understanding of the way we can use</p> <p>2 it, it is deeper, but it's just more or less a copy</p> <p>3 and paste of information from in this case the VWR</p> <p>4 product information back to in this case the TINE</p> <p>5 requisition database of e-Procurement.</p> <p>6 Q And if you turn to the slide on the page</p> <p>7 with the Bates number ending 451.</p> <p>8 A Yes.</p> <p>9 Q Is that what's been done, that you've</p> <p>10 brought the item back from the VWR website into</p> <p>11 your shopping cart in the TINE implementation of</p> <p>12 the e-Procurement application?</p> <p>13 A Yes.</p> <p>14 Q And then if you click on the "Continue"</p> <p>15 button on this slide, what screen would be</p> <p>16 presented next to the user?</p> <p>17 A To be quite honest, I don't know, since I</p> <p>18 don't know the TINE implementation by heart. But I</p> <p>19 would expect that you would just sort of create a</p> <p>20 position in your shopping cart, which is what's</p> <p>21 happening on slide 452.</p> <p>22 Q And once you click on the button in</p>	<p>219</p> <p>1 e-Procurement is?</p> <p>2 A E-Procurement, I think it's labeled</p> <p>3 13.1.1.3.0.</p> <p>4 Q So EPR 6, the reference at the top of the</p> <p>5 page, would relate to a prior version of</p> <p>6 e-Procurement?</p> <p>7 A I can't say, since I don't really</p> <p>8 understand the document. There's no heading, no</p> <p>9 footage, no...</p> <p>10 Q Do you see under item number 1, which is</p> <p>11 entitled "Include core M3 Item Master items in</p> <p>12 EPR," there's an open R&amp;D issue at the bottom of</p> <p>13 that text reading, "Are UNSPSC mappings for product</p> <p>14 groups available from M3?" Do you know with</p> <p>15 respect to the current version of e-Procurement,</p> <p>16 are UNSPSC mappings for product groups available</p> <p>17 from M3?</p> <p>18 A I wouldn't use the word "mappings." But</p> <p>19 my understanding is you can range, you can say that</p> <p>20 for a product group, you can say what UNSPSC</p> <p>21 numbers that is -- and it's just an entry feed,</p> <p>22 from-to, is meant to support by this product group.</p>
<p>218</p> <p>1 slide -- on the page on 452, the button labeled</p> <p>2 "Create Requisition," what would happen next?</p> <p>3 A Now you're back to the standard</p> <p>4 functionality, and now you have created one line in</p> <p>5 your shopping start. The next step in the work</p> <p>6 flow is to create a requisition.</p> <p>7 Q Thank you. I think I'm done with that</p> <p>8 document.</p> <p>9 MS. ALBERT: Let me have the reporter</p> <p>10 mark as Billgren Exhibit 17 a document entitled</p> <p>11 "EPR 6 Requirements." It bears production number</p> <p>12 LE 00220071 through 80.</p> <p>13 (Billgren Exhibit 17 was marked for</p> <p>14 identification and attached to the deposition</p> <p>15 transcript.)</p> <p>16 BY MS. ALBERT:</p> <p>17 Q Are you familiar with the document that's</p> <p>18 been marked as Billgren Exhibit 17?</p> <p>19 A No, I'm not.</p> <p>20 Q Do you know who created this document?</p> <p>21 A No, I do not.</p> <p>22 Q What did you say the current version of</p>	<p>220</p> <p>1 Q So you can associate --</p> <p>2 A That I have seen in the standard</p> <p>3 solution.</p> <p>4 Q So you can associate --</p> <p>5 A But I don't know, since I don't know</p> <p>6 where this comes from, I don't really understand</p> <p>7 the context here.</p> <p>8 Q But in the standard e-Procurement</p> <p>9 application, you can associate UNSPSC commodity</p> <p>10 codes with the product groups?</p> <p>11 A Ranges. Because the product group is not</p> <p>12 a specific product. It's just a group of products.</p> <p>13 Q Do you see under item 7, that item is</p> <p>14 labeled "Allow user to view supplier name and</p> <p>15 search user interface"? Is that feature available</p> <p>16 in the current version of the e-Procurement</p> <p>17 application?</p> <p>18 A I can't say. I don't think so. But I</p> <p>19 can't say.</p> <p>20 Q What would you need to review in order to</p> <p>21 answer that question?</p> <p>22 A I need to understand what document this</p>

<p>221</p> <p>1 is.</p> <p>2 Q Well, I'm not necessarily asking it</p> <p>3 specifically to this document. I'm just using that</p> <p>4 to ask a question about the current e-Procurement</p> <p>5 application and its functionality.</p> <p>6 A Okay. And so what was the question</p> <p>7 again?</p> <p>8 Q With respect to the current version of</p> <p>9 e-Procurement application, does that have the</p> <p>10 capability to allow the user to view the supplier</p> <p>11 in the search user interface?</p> <p>12 A Implement a generic mechanism to perform</p> <p>13 prefix searches. We don't have wild card searches</p> <p>14 in this solution today, which is what I can -- my</p> <p>15 understanding, reading the text here, for what it's</p> <p>16 worth, is that we don't have that today.</p> <p>17 Q Well, just aside from this document, in</p> <p>18 the current version of the e-Procurement</p> <p>19 application, does the user have the ability to view</p> <p>20 the supplier name in the search user interface?</p> <p>21 A View the supplier name -- in the search</p> <p>22 of...</p>	<p>223</p> <p>1 be limitation on how you can do partial.</p> <p>2 Q What is the functionality that allows a</p> <p>3 supplier to perform partial delivery confirmation</p> <p>4 that's currently in the product?</p> <p>5 A My understanding is you can say a</p> <p>6 variable quantity, and if the quantity is C, then</p> <p>7 the line is off. And of course the date.</p> <p>8 Q If the quantity is C, what do you mean by</p> <p>9 that?</p> <p>10 A Zero.</p> <p>11 Q Zero. Okay.</p> <p>12 MS. ALBERT: Let me have the reporter</p> <p>13 mark as Billgren Exhibit 18 -- I don't know that</p> <p>14 this document has any title. It bears production</p> <p>15 numbers LE 00220257 through 275.</p> <p>16 (Billgren Exhibit 18 was marked for</p> <p>17 identification and attached to the deposition</p> <p>18 transcript.)</p> <p>19 THE WITNESS: Can I just have something</p> <p>20 to drink?</p> <p>21 BY MS. ALBERT:</p> <p>22 Q Sure.</p>
<p>222</p> <p>1 Q In the search of the catalogs. When</p> <p>2 you're searching for items to build a requisition,</p> <p>3 does --</p> <p>4 A The name will be viewed, yes.</p> <p>5 MR. SCHULTZ: In just looking at that</p> <p>6 question, I'm going to object to that as vague.</p> <p>7 BY MS. ALBERT:</p> <p>8 Q Can you turn to the page with the Bates</p> <p>9 number that ends with 078.</p> <p>10 A Yes.</p> <p>11 Q Does the current version of the</p> <p>12 e-Procurement application include the ability to</p> <p>13 allow suppliers to perform partial delivery</p> <p>14 confirmation?</p> <p>15 A Again, when it relates to the document, I</p> <p>16 have a problem in understanding.</p> <p>17 Q Aside from the document.</p> <p>18 A Aside from the document.</p> <p>19 Q In the e-Procurement solution as</p> <p>20 delivered, is there the ability to allow suppliers</p> <p>21 to perform partial delivery confirmation?</p> <p>22 A My understanding, yes. But there might</p>	<p>224</p> <p>1 A I don't know if you want that on the</p> <p>2 picture. Maybe it doesn't matter.</p> <p>3 Yes.</p> <p>4 Q Have you ever seen the document that's</p> <p>5 been marked as Billgren Exhibit 18 before?</p> <p>6 A No, I have not.</p> <p>7 Q Do you know what it relates to?</p> <p>8 A I do know what it relates to. I think I</p> <p>9 understand what it relates to.</p> <p>10 Q What does it relate to?</p> <p>11 A Then I do need to read the document to</p> <p>12 answer that question. But I think it would be fair</p> <p>13 for me to assume that this is a document in</p> <p>14 preparation of a business case for our own</p> <p>15 development of a Product Information Management</p> <p>16 solution.</p> <p>17 Q Is that the Product Information</p> <p>18 Management solution to which you referred a little</p> <p>19 bit earlier?</p> <p>20 A Yes. It is to the Product Information</p> <p>21 Management solution that we have not developed and</p> <p>22 we don't have, but where we have partners.</p>

<p>225</p> <p>1 Q Who are the partners?</p> <p>2 A A company called Inriver. They're</p> <p>3 relatively new. And a company called UDK, who is</p> <p>4 mentioned in this document..</p> <p>5 Q Does the Product Information Management</p> <p>6 solution have any relevance to the e-Procurement</p> <p>7 application?</p> <p>8 A No.</p> <p>9 Q Is it intended that the Product</p> <p>10 Information Management solution could be used in</p> <p>11 association with the e-Procurement solution?</p> <p>12 A No. It's the opposite side of the</p> <p>13 process. It's when I am a manufacturer of an</p> <p>14 equipment that I want to sell, and I want to create</p> <p>15 a catalog for my equipments that others could punch</p> <p>16 out to and possibly buy from me.</p> <p>17 Q So you could have a supplier catalog of</p> <p>18 equipment and use one of the M3 applications to</p> <p>19 build a requisition and generate a purchase order?</p> <p>20 A No. I wouldn't say that. It has nothing</p> <p>21 to do with a supplier catalog. It's my product</p> <p>22 catalog. It's me, the company, the OEM. I have my</p>	<p>227</p> <p>1 more.</p> <p>2 Q I think I'm done with that document.</p> <p>3 MS. ALBERT: Let me have the reporter</p> <p>4 mark as Billgren Exhibit 19 a document entitled</p> <p>5 "OAGIS 9_2 GetCatalog Documentation." It bears</p> <p>6 production numbers LE 00047473 through 621.</p> <p>7 (Billgren Exhibit 19 was marked for</p> <p>8 identification and attached to the deposition</p> <p>9 transcript.)</p> <p>10 BY MS. ALBERT:</p> <p>11 Q Have you ever seen the document that's</p> <p>12 been marked as Billgren and 19 before?</p> <p>13 A I have not.</p> <p>14 Q Do you know, are you familiar with the</p> <p>15 OAGIS organization?</p> <p>16 A I think so, but you need to clarify what</p> <p>17 this means in this context.</p> <p>18 Q Do you know if that's an open source</p> <p>19 organization?</p> <p>20 A So this document and the OAGIS, so what</p> <p>21 is your understanding that this means?</p> <p>22 Q Well, my understanding is that OAGIS is</p>
<p>226</p> <p>1 catalog of products that I want to sell.</p> <p>2 And I need to manage them. I need to</p> <p>3 take photographs of the products. I need to have</p> <p>4 various text on the products. And I publish these</p> <p>5 products in a catalog, in a quite complex process,</p> <p>6 to secure that my customers can look at them and</p> <p>7 buy from me, either through my front end, my web</p> <p>8 pages, which is -- or use Punchout from there,</p> <p>9 e-Procurement, whatever solutions they have to come</p> <p>10 into my product catalog.</p> <p>11 And typically these catalogs, main driver</p> <p>12 for them is to be able to produce a printed catalog</p> <p>13 like L. L. Bean, for instance, if you talk about an</p> <p>14 American. Not that we have them as customers, but</p> <p>15 that's just an example. The Kia catalog.</p> <p>16 Q Do you have a projected date for when the</p> <p>17 Product Information Management solution is going to</p> <p>18 be commercially available?</p> <p>19 A No, not at all. As I said, this is</p> <p>20 something that hasn't taken off. So instead of</p> <p>21 doing any development on behalf of Lawson, we have</p> <p>22 engaged with two partners so far. It might be</p>	<p>228</p> <p>1 an open source organization. I can't remember what</p> <p>2 the acronym means.</p> <p>3 A I also have that sort of a -- I'm aware</p> <p>4 of -- I've seen the abbreviation before, but I</p> <p>5 don't know what this -- comes into this context.</p> <p>6 Q Does Lawson make use of open source in</p> <p>7 connection with its source code for the M3</p> <p>8 e-Procurement application?</p> <p>9 A I haven't seen this document.</p> <p>10 Q Do you know if Lawson makes use of any</p> <p>11 open source in connection with its source code for</p> <p>12 the M3 e-Procurement application?</p> <p>13 A Not -- I would not be able to say that</p> <p>14 specifically.</p> <p>15 Q Who would you ask to find out the answer</p> <p>16 to that question?</p> <p>17 A I would have asked the designer of our</p> <p>18 solution.</p> <p>19 Q Who is that person?</p> <p>20 A That would probably have been an</p> <p>21 individual in the development organization, Thim</p> <p>22 Othskov.</p>



<p>229</p> <p>1 Q What was the name you provided?</p> <p>2 A Thim Othskov.</p> <p>3 Q How do you spell that?</p> <p>4 A For that I need a pen. It's a Danish</p> <p>5 name.</p> <p>6 Q Okay. We'll let the reporter collect</p> <p>7 that afterwards.</p> <p>8 A For me, it's a little bit different, to</p> <p>9 use sort of table of contents and -- yes. Yes.</p> <p>10 What was your question again?</p> <p>11 Q I just was asking if Lawson made use of</p> <p>12 open source in its source code.</p> <p>13 A From OAIGS or --</p> <p>14 Q Well, I just didn't know if perhaps some</p> <p>15 of these business object documents that are</p> <p>16 included in this document might be utilized by</p> <p>17 Lawson in its software.</p> <p>18 A My first immediate answer would have been</p> <p>19 no. But I would have to leave it open to a certain</p> <p>20 degree, because I don't know where this document</p> <p>21 comes from, and I don't know the context. So I</p> <p>22 don't know.</p>	<p>231</p> <p>1 A My answer -- yes. I need to check.</p> <p>2 Q With whom would you check?</p> <p>3 A As I mentioned before, the same</p> <p>4 individual.</p> <p>5 Q I think I'm done with that document.</p> <p>6 A Yes.</p> <p>7 Q We talked a little bit about the</p> <p>8 maintenance and support. And I think you</p> <p>9 referenced that typically it's 21 percent of the</p> <p>10 license fee; is that correct?</p> <p>11 A That's correct.</p> <p>12 Q What services are provided as part of the</p> <p>13 ongoing maintenance and support with respect to the</p> <p>14 e-Procurement application?</p> <p>15 A With respect to all M3 applications I'm</p> <p>16 prepared to answer, because it's a generic</p> <p>17 offering. We allow you to -- if there should be</p> <p>18 enhancements or new versions within what you have</p> <p>19 licensed, then you can obtain those for free. We</p> <p>20 would correct errors. And we would also support</p> <p>21 regulatory or statutory requirements in those</p> <p>22 geographies that was included when the original</p>
<p>230</p> <p>1 Q Could you turn to the page with the Bates</p> <p>2 number ending 478. It's just a few pages into the</p> <p>3 document.</p> <p>4 A Yes.</p> <p>5 Q And do you see on that page there's an</p> <p>6 element, "Get Catalog"?</p> <p>7 A Mm-hmm.</p> <p>8 Q Do you know if Lawson makes use of the</p> <p>9 Get Catalog functionality in its e-Procurement</p> <p>10 application?</p> <p>11 A My level of -- my answer would have been</p> <p>12 at the starting point no. But my level of</p> <p>13 competence in the actual code limits me here for a</p> <p>14 while. So I don't dare to answer that one. But my</p> <p>15 first answer would have been no. Sorry to be a bit</p> <p>16 blurry. Because I don't know where you got this</p> <p>17 document from.</p> <p>18 Q Well, we got it from somebody at Lawson.</p> <p>19 I don't know who.</p> <p>20 A Yes.</p> <p>21 Q Do you know who would maintain this type</p> <p>22 of documentation in their files?</p>	<p>232</p> <p>1 license agreement was signed.</p> <p>2 Q Is there a help desk that would be</p> <p>3 provided as part of the maintenance and support</p> <p>4 services?</p> <p>5 A Yes, there is support.</p> <p>6 Q And you indicated that updates and</p> <p>7 enhancements are available as part of the</p> <p>8 maintenance and support, correct?</p> <p>9 A (Witness nods head.)</p> <p>10 Q Will Lawson personnel assist a customer</p> <p>11 in debugging and fixing problems that arise with</p> <p>12 respect to the e-Procurement module as part of the</p> <p>13 ongoing maintenance and support services provided?</p> <p>14 A Again, answering outside of</p> <p>15 e-Procurement, the general offering is that we</p> <p>16 don't debug. The customer has to explain the</p> <p>17 error, if there is an error, and then it's our</p> <p>18 commitment to correct the errors, not to find the</p> <p>19 error.</p> <p>20 Q Does Lawson provide training and</p> <p>21 education to its customers as part of the ongoing</p> <p>22 maintenance and support services available with the</p>

<p>233</p> <p>1 M3 product line?</p> <p>2 A Yes, we do.</p> <p>3 Q Does Lawson provide documentation to its</p> <p>4 customers as part of the ongoing support provided</p> <p>5 with the M3 product line?</p> <p>6 A Yes. Provided by definition, yes,</p> <p>7 documentation, yes.</p> <p>8 Q What types of documentation are provided</p> <p>9 to customers?</p> <p>10 A Documentation in -- yes, there are so</p> <p>11 many angles to that point. It's topic-related.</p> <p>12 It's -- I need to take a time out on that one,</p> <p>13 because that I need to think about. Because I</p> <p>14 can't just phrase it up. It's documentation. Is</p> <p>15 that...</p> <p>16 Q I was trying to figure out what specific</p> <p>17 types of documentation would be provided to</p> <p>18 customers.</p> <p>19 A All customers would receive online help</p> <p>20 text. They will receive -- but the question you</p> <p>21 originally asked was in conjunction with a support</p> <p>22 agreement, and in addition to the software</p>	<p>235</p> <p>1 to that?</p> <p>2 A My shipment office, again.</p> <p>3 Q Does Lawson provide installation and</p> <p>4 implementation services for its customers with</p> <p>5 respect to the e-Procurement module?</p> <p>6 A Yes.</p> <p>7 Q What type of implementation services are</p> <p>8 provided to customers of the e-Procurement module?</p> <p>9 A We provide what they ask for and what is</p> <p>10 needed to get the solution implemented.</p> <p>11 Q So will you provide services to assist</p> <p>12 them with setting up the catalog database in the</p> <p>13 Buy Center?</p> <p>14 A No. I mean, the -- first of all, you</p> <p>15 don't set up a catalog in the Buy Center in</p> <p>16 e-Procurement. You work in the Supply Center. And</p> <p>17 the supplier edits and updates their product lists</p> <p>18 and catalogs. And we will not assist in that</p> <p>19 process, the ones I mentioned.</p> <p>20 Q Would you assist an e-Procurement</p> <p>21 customer if it had an old system and it wanted to</p> <p>22 migrate its old Item Master data into the database</p>
<p>234</p> <p>1 documentation. So that's how I answered. In</p> <p>2 addition to the software documentation that you</p> <p>3 obtain when you receive the software, which is</p> <p>4 online help text as such, you also receive, as a</p> <p>5 support maintenance paying customer, additional</p> <p>6 documentations and educations that you can</p> <p>7 participate in learning in specific topics,</p> <p>8 specific areas.</p> <p>9 We organize webinars for customers to</p> <p>10 come in and listen and also see documentation on</p> <p>11 topic related areas. That's how I answered the</p> <p>12 question, hence my -- because the software</p> <p>13 documentation is provided for when you sign the</p> <p>14 license agreement.</p> <p>15 Q What is the standard software</p> <p>16 documentation that would be provided when you sign</p> <p>17 the license agreement with respect to the</p> <p>18 e-Procurement module?</p> <p>19 A What we provide is -- I am not 100</p> <p>20 percent sure if one of the guides here is part of</p> <p>21 our software delivery today.</p> <p>22 Q Who would you ask to find out the answer</p>	<p>236</p> <p>1 in the e-Procurement application?</p> <p>2 A If a customer asks for migration of any</p> <p>3 kind of data, and if he wants to pay our technology</p> <p>4 consultants, we would offer whatever. But I'm not</p> <p>5 sure that's an answer to your question, because</p> <p>6 it's a technical consultant job.</p> <p>7 Q Will Lawson provide services to integrate</p> <p>8 the e-Procurement module with the M3 Business</p> <p>9 Engine?</p> <p>10 A Yes.</p> <p>11 Q How are the installation and</p> <p>12 implementation services billed? What are the costs</p> <p>13 associated with that?</p> <p>14 A Costs, or how they are billed?</p> <p>15 Q How are these types of services priced,</p> <p>16 is a better question.</p> <p>17 A Again, generic answer, we can either</p> <p>18 price as time and material, or you can have any</p> <p>19 kind of other agreement with the customer. I don't</p> <p>20 know how -- you're talking about e-Procurement, was</p> <p>21 your -- we have done one implementation in the</p> <p>22 United States, and I don't know how that very</p>

<p style="text-align: right;">237</p> <p>1 implementation was billed, if it was time and</p> <p>2 material or if it was any kind of other</p> <p>3 arrangement.</p> <p>4 Q Can you describe the process pursuant to</p> <p>5 which Lawson would obtain a contract for the</p> <p>6 e-Procurement module?</p> <p>7 A Describe the process how it would obtain,</p> <p>8 how do you mean?</p> <p>9 Q Would a prospective customer issue a</p> <p>10 request for proposal for the e-Procurement</p> <p>11 application?</p> <p>12 A Okay. It would be great. It's never</p> <p>13 happened.</p> <p>14 Q Well, with respect to the customers that</p> <p>15 you do have for the e-Procurement application, how</p> <p>16 did you go about signing the contracts with those</p> <p>17 customers?</p> <p>18 A We typically engage with an account</p> <p>19 executive or a salesman. Hence you saw some of</p> <p>20 the -- this business case they didn't move on,</p> <p>21 we're taking e-Procurement to the United States, we</p> <p>22 didn't invest in that side. But typically we would</p>	<p style="text-align: right;">239</p> <p>1 A In -- at least in the cases where we have</p> <p>2 the customers today, in many of those it was part</p> <p>3 of their -- what they asked for.</p> <p>4 Q So those customers issued a request for</p> <p>5 proposal?</p> <p>6 A Sorry?</p> <p>7 Q Those customers issued a request for</p> <p>8 proposal to you?</p> <p>9 A Yes, that could be one way, when they</p> <p>10 engage.</p> <p>11 Q And then would Lawson in such a situation</p> <p>12 develop a response to that request for proposal?</p> <p>13 A Yes, we would.</p> <p>14 Q How are responses to RFPs drafted?</p> <p>15 A How do you mean, drafted?</p> <p>16 Q What's the process by which Lawson would</p> <p>17 put together a response to an RFP?</p> <p>18 A It's part of our sales process. It would</p> <p>19 be the account executive who responds to the RFP,</p> <p>20 typically in the form where it's asked for together</p> <p>21 with the solution consultant.</p> <p>22 Q Did they have -- does the product</p>
<p style="text-align: right;">238</p> <p>1 have to find the customer and prove the value of</p> <p>2 our solution.</p> <p>3 Q How are customer leads generated?</p> <p>4 A In many ways. But...</p> <p>5 Q Have you had, you know, for the --</p> <p>6 A You're talking about e-Procurement now?</p> <p>7 Q Right.</p> <p>8 A We have sort of -- in U.S.?</p> <p>9 Q No, anywhere. I'm just trying to learn</p> <p>10 in general what the process is by which you acquire</p> <p>11 customers for the e-Procurement application.</p> <p>12 A For the e-Procurement application? We</p> <p>13 don't have very many campaigns for that. So</p> <p>14 it's -- yes. It's anomalous if it happens. We</p> <p>15 don't have aggressive campaigns for finding</p> <p>16 e-Procurement customers.</p> <p>17 Q Have you ever had a customer issue a</p> <p>18 request for proposal that relates to the</p> <p>19 e-Procurement application or in which e-Procurement</p> <p>20 was one element?</p> <p>21 A Yes. We have.</p> <p>22 Q And what customer was that?</p>	<p style="text-align: right;">240</p> <p>1 management have any input into responses to RFPs?</p> <p>2 A No, not really. We might be asked to</p> <p>3 support with expertise. But we don't reply to</p> <p>4 RFPs.</p> <p>5 Q Do you help the sales account executive</p> <p>6 draft answers where there are questions relating to</p> <p>7 functional requirements?</p> <p>8 A Not on a general base. If there are</p> <p>9 questions where the sales team cannot answer, and</p> <p>10 they don't know whether the standard solution do</p> <p>11 that specific feature that they've been asked for,</p> <p>12 then they of course are allowed and should ask us</p> <p>13 for advice.</p> <p>14 Q Does Lawson maintain any sort of database</p> <p>15 or repository with standard answers to RFP</p> <p>16 questions with respect to the M3 product line?</p> <p>17 A No, I would say we don't have automated</p> <p>18 answers to RFPs.</p> <p>19 MS. ALBERT: Let me have the reporter</p> <p>20 mark as Billgren Exhibit 20 a document entitled</p> <p>21 "The Directory Listing the Proposal Automation</p> <p>22 Suite." It bears production numbers LE 00351791</p>

<p>241</p> <p>1 through 803.</p> <p>2 (Billgren Exhibit 20 was marked for</p> <p>3 identification and attached to the deposition</p> <p>4 transcript.)</p> <p>5 BY MS. ALBERT:</p> <p>6 Q Are you familiar with the Proposal</p> <p>7 Automation suite?</p> <p>8 <b>A In what context?</b></p> <p>9 Q Have you ever made use of the Proposal</p> <p>10 Automation suite?</p> <p>11 <b>A Again, in what context?</b></p> <p>12 Q In any context.</p> <p>13 <b>A I'm not sure I understand.</b></p> <p>14 Q Have you ever heard of the Proposal</p> <p>15 Automation suite before?</p> <p>16 <b>A From a Lawson perspective, or --</b></p> <p>17 Q Yes. Have you ever heard of a Proposal</p> <p>18 Automation suite being used within Lawson's</p> <p>19 organization?</p> <p>20 <b>A Yes. I am aware of that sales operation,</b></p> <p>21 <b>sales ops are working with something like this,</b></p> <p>22 <b>yes.</b></p>	<p>243</p> <p>1 Lawson's efforts to collect documents responsive to</p> <p>2 ePlus's document requests served in this</p> <p>3 litigation?</p> <p>4 <b>A Define "engaged."</b></p> <p>5 Q Did you have any involvement in Lawson's</p> <p>6 efforts to collect documents that would respond to</p> <p>7 ePlus's discovery requests in this litigation?</p> <p>8 <b>A I think so, yes. I was replicated or</b></p> <p>9 <b>opened up my own folders, my e-mails, and I also</b></p> <p>10 <b>helped in relation to guiding what type of</b></p> <p>11 <b>information, what kind of documentation we might</b></p> <p>12 <b>have available.</b></p> <p>13 Q So besides assisting with collecting your</p> <p>14 own files, what was the nature of your assistance</p> <p>15 with respect to finding documentation on the M3</p> <p>16 product line?</p> <p>17 <b>A Quite limited, and it was around old</b></p> <p>18 <b>documentation of M3.</b></p> <p>19 Q Do you know who else within Lawson had</p> <p>20 any involvement in collecting documents relevant to</p> <p>21 the M3 product line?</p> <p>22 <b>A Other than myself?</b></p>
<p>242</p> <p>1 Q Do you see at the top of the page, the</p> <p>2 third line reads, "Database: F:\RFP</p> <p>3 Machine\Data\LawsonM3Data.mdb"?</p> <p>4 <b>A Yes, I can read that. Yes.</b></p> <p>5 Q Is there a portion of the proposal, the</p> <p>6 answers contained for the Proposal Automation</p> <p>7 suite, that relate to the M3 product line?</p> <p>8 <b>A Sorry, what was the question?</b></p> <p>9 MS. ALBERT: Can you read it back,</p> <p>10 please?</p> <p>11 (Requested portion of record read.)</p> <p>12 THE WITNESS: Yes.</p> <p>13 MS. ALBERT: We could not find a document</p> <p>14 that contains the answers. All we can find is this</p> <p>15 directory. So I would request that the answers be</p> <p>16 provided.</p> <p>17 MR. SCHULTZ: Okay. I will look into</p> <p>18 that.</p> <p>19 MS. ALBERT: That's all I have for that</p> <p>20 document. That's all I have for that exhibit.</p> <p>21 BY MS. ALBERT:</p> <p>22 Q Mr. Billgren, were you engaged in</p>	<p>244</p> <p>1 Q Right.</p> <p>2 <b>A I'm aware of myself and what I did. But</b></p> <p>3 <b>I don't know how many others.</b></p> <p>4 Q Where did you search for documents</p> <p>5 relating to the old documentation of M3?</p> <p>6 <b>A It was not electronic, because old</b></p> <p>7 <b>documentation was not electronic, so we physically</b></p> <p>8 <b>looked in cabinets, which was scanned and made</b></p> <p>9 <b>available.</b></p> <p>10 Q What documentation relating to old M3</p> <p>11 products was located?</p> <p>12 <b>A Sorry?</b></p> <p>13 Q What documentation relating to old M3</p> <p>14 products was located?</p> <p>15 <b>A Was located? It was documentation on M3</b></p> <p>16 <b>version 7. It wasn't called M3 at the time. Movex</b></p> <p>17 <b>version 7. And specific documentation of Movex,</b></p> <p>18 <b>even earlier versions, in the Procurement area.</b></p> <p>19 Q Did Lawson search any centralized</p> <p>20 repositories for documents relating to the M3</p> <p>21 product line?</p> <p>22 <b>A To my understanding, yes, since we were</b></p>

<p>245</p> <p>1 all asked to sort of make all our folders available</p> <p>2 onto one place, I assume that that was searched.</p> <p>3 Q Are there any standard centralized</p> <p>4 repositories that are used in your day to day</p> <p>5 business with respect to the M3 product line?</p> <p>6 A They were -- we were asked to sort of</p> <p>7 open up our folders to all databases. There are</p> <p>8 some Notes databases that people are using day to</p> <p>9 day where I think some of this might have come</p> <p>10 from. We just opened up those, how do you say --</p> <p>11 how do you say that in English -- My Computer views</p> <p>12 on a laptop. And then your servers, your dedicated</p> <p>13 servers that you use were there, and they were part</p> <p>14 of what was submitted.</p> <p>15 Q Do you know if anyone collected the</p> <p>16 source code for the M3 e-Procurement application?</p> <p>17 A No, I don't know if that has happened.</p> <p>18 Q Who is responsible for maintaining the</p> <p>19 source code for the M3 e-Procurement application?</p> <p>20 A Lawson.</p> <p>21 Q Is there anyone within your product group</p> <p>22 that has responsibilities for the source code for</p>	<p>247</p> <p>1 6:35 p.m.)</p> <p>2 * * *</p> <p>3 ACKNOWLEDGEMENT OF DEPONENT</p> <p>4 I, HENRIK BILLGREN, do hereby acknowledge</p> <p>5 that I have read and examined the foregoing</p> <p>6 testimony, and the same is a true, correct and</p> <p>7 complete transcription of the testimony given by</p> <p>8 me, and any corrections appear on the attached</p> <p>9 Errata sheet signed by me.</p> <p>10</p> <p>11 _____</p> <p>12 (DATE) (SIGNATURE)</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p>246</p> <p>1 the e-Procurement application?</p> <p>2 A Using the word "responsibility," the</p> <p>3 source code as such is on an escrow agreement.</p> <p>4 It's stored in the back.</p> <p>5 (The reporter asked for clarification.)</p> <p>6 A Escrow. Escrow.</p> <p>7 Q Yes.</p> <p>8 A So from a responsibility perspective,</p> <p>9 that's what it is. Then everybody, they just work</p> <p>10 with what they work with.</p> <p>11 MS. ALBERT: I think it might be a good</p> <p>12 stopping point for today.</p> <p>13 MR. SCHULTZ: Okay.</p> <p>14 THE WITNESS: Okay.</p> <p>15 MS. ALBERT: And we'll recess for today</p> <p>16 and begin again tomorrow at approximately 8:30 a.m.</p> <p>17 MR. SCHULTZ: Okay.</p> <p>18 THE VIDEOGRAPHER: This marks the end of</p> <p>19 tape number 4 in the deposition of Mr. Billgren.</p> <p>20 We're going off the record. The time is 6:35 p.m.</p> <p>21 (Signature having not been waived, the</p> <p>22 deposition of HENRIK BILLGREN was adjourned at</p>	<p>248</p> <p>1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC</p> <p>2 I, Lee Bursten, the officer before whom</p> <p>3 the foregoing deposition was taken, do hereby</p> <p>4 certify that the foregoing transcript is a true and</p> <p>5 correct record of the testimony given; that said</p> <p>6 testimony was taken by me stenographically and</p> <p>7 thereafter reduced to typewriting under my</p> <p>8 direction; and that I am neither counsel for,</p> <p>9 related to, nor employed by any of the parties to</p> <p>10 this case and have no interest, financial or</p> <p>11 otherwise, in its outcome.</p> <p>12 IN WITNESS WHEREOF, I have hereunto set</p> <p>13 my hand and affixed my notarial seal this 26th day</p> <p>14 of October, 2009.</p> <p>15 My commission expires: June 30, 2014.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 _____</p> <p>20 LEE BURSTEN</p> <p>21 NOTARY PUBLIC IN AND FOR</p> <p>22 THE DISTRICT OF COLUMBIA</p>

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1           ERRATA SHEET

2           IN RE: ePLUS INC. v. LAWSON SOFTWARE, INC.

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1           ERRATA SHEET CONTINUED

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF ePLUS INC'S OBJECTIONS TO DEFENDANT'S COUNTER  
DEPOSITION DESIGNATIONS, COUNTER-COUNTER DESIGNATIONS  
AND REVISED SUMMARY OF THE DEPOSITION OF  
HENRIK BILLGREN (OCT. 21, 2009)**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

Daniel McDonald, *pro hac vice*  
William D. Schultz, *pro hac vice*  
Rachel C. Hughey, *pro hac vice*  
Joshua P. Graham, *pro hac vice*  
Andrew Lagatta, *pro hac vice*  
Merchant & Gould P.C.  
3200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 332-5300  
Facsimile: (612) 332-9081  
[lawsonservice@merchantgould.com](mailto:lawsonservice@merchantgould.com)

Robert A. Angle (VSB# 37691)  
Dabney J. Carr, IV (VSB #28679)  
Troutman Sanders LLP  
P.O. Box 1122  
Richmond, VA 23218-1122  
Telephone: (804) 697-1238  
Facsimile: (804) 698-5119  
[robert.angle@troutmansanders.com](mailto:robert.angle@troutmansanders.com)  
[dabney.carr@troutmansanders.com](mailto:dabney.carr@troutmansanders.com)

*Counsel for Defendant Lawson Software, Inc.*

/s/  
\_\_\_\_\_  
David M. Young (VSB #35997)  
**GOODWIN PROCTER LLP**  
901 New York Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444

[dyoung@goodwinprocter.com](mailto:dyoung@goodwinprocter.com)